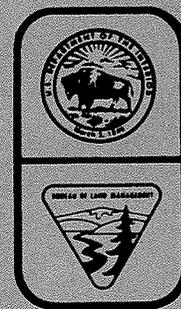
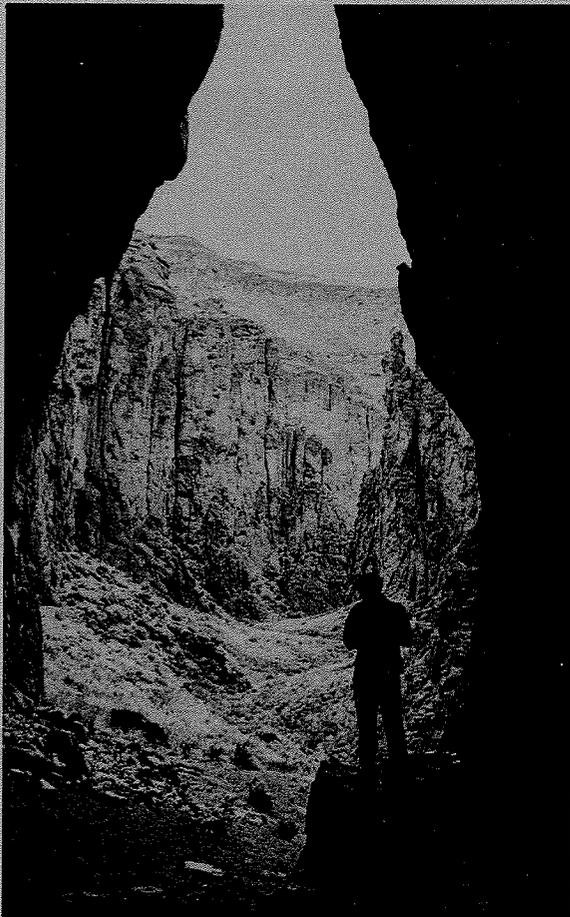


JARBIDGE WILDERNESS

FINAL ENVIRONMENTAL IMPACT STATEMENT



UNITED STATES
DEPARTMENT OF THE INTERIOR
BUREAU OF LAND MANAGEMENT

BOISE DISTRICT

SEPTEMBER 1987

BLM MISSION STATEMENT

"The Bureau of Land Management is responsible for the balanced management of the Public Lands and resources and their various values so that they are considered in a combination that will best serve the needs of the American People. Management is based upon the principles of multiple-use and sustained yield; a combination of uses that takes into account the long term needs of future generations for renewable and non-renewable resources. These resources include recreation, range, timber, minerals, watershed, fish and wildlife, wilderness and natural, scenic, scientific and cultural values."

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CHAPTER 1

INTRODUCTION AND PLANNING PROCESS

PURPOSE AND NEED

The purpose of the Proposed Action is to manage and preserve the wilderness characteristics on 37,540 BLM acres (20,800 acres in Bruneau River-Sheep Creek WSA and 16,740 acres in Jarbidge River WSA) and continue to manage the remaining 141,984 acres (83,606 acres and 58,378 acres respectively) in these two WSAs and the entire King Hill Creek WSA (29,309 acres) for uses other than wilderness. This EIS assesses the environmental consequences of managing three WSAs as wilderness or nonwilderness, of managing portions of the three WSAs as wilderness, and of managing portions of two WSAs as a wild river.

The Federal Land Policy and Management Act of 1976 (FLPMA) directs the Bureau of Land Management (BLM) to manage the public lands and their resources under the principles of multiple use and sustained yield. Section 603 of FLPMA requires a wilderness review of BLM roadless areas of 5,000 or more acres and roadless islands. The BLM inventory process identified WSAs which have the mandatory wilderness characteristics of size, naturalness, and outstanding opportunities for solitude and/or primitive recreation. Suitable or unsuitable wilderness recommendations for each WSA will be presented to the President by the Secretary of the Interior. The President will then make recommendations to the Congress. Areas can be designated wilderness only by an act of Congress. If designated as wilderness, an area would be managed in accordance with the Wilderness Act of 1964.

The three WSAs being studied are covered by three different land use plans; Bruneau and Bennett Hills Management Framework Plans (MFPs) and the Jarbidge Resource Management Plan (RMP). The RMP was the primary document utilized in the preparation of this EIS. The study areas are listed in Table 1-1 below.

LIST OF WILDERNESS STUDY AREAS

WSA Name	Number	Acreage	County	Land Use Plans
Bruneau River - Sheep Creek	ID-111-17	104,406	Owyhee	Bruneau MFP Jarbidge RMP
Jarbidge River	ID-17-11	75,118	Owyhee	Bruneau MFP Jarbidge RMP
King Hill Creek	ID-19-2	29,309	Elmore	Jarbidge RMP Bennett Hills MFP

LOCATION

The WSAs are located in southwestern Idaho in the BLM's Boise District; the eastern edge of King Hill Creek WSA is within the Shoshone District. Map 1 (page 1-3) shows the relative location of the areas.

ENVIRONMENTAL ISSUE IDENTIFICATION/SCOPING

The scoping process for the Jarbidge Wilderness EIS encompasses issues identified by the BLM staff and by the public during the preparation of the land use plans. During the preparation of the land use plans, there was consultation with the Idaho State Historic Preservation Officer concerning the presence or absence of cultural resources in the WSAs that would be eligible for nomination for listing on the "National Register of Historic Places." The United States Fish and Wildlife Service was consulted concerning the potential effects of wilderness designation on threatened or endangered species. The environmental issues identified for analysis in this EIS follow.

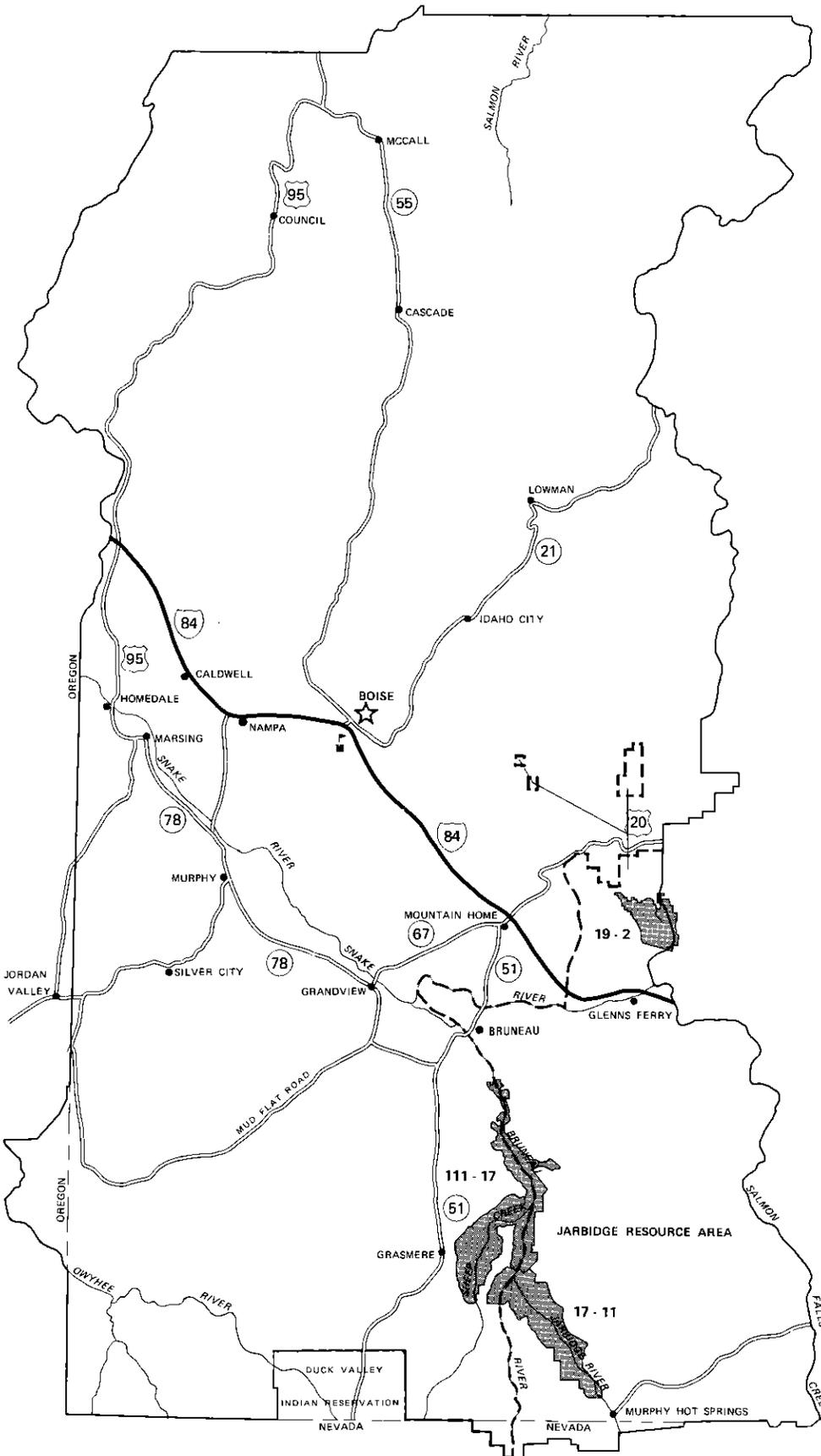
1. Impacts on Wilderness Values. The wilderness values of naturalness, opportunities for solitude, opportunities for primitive recreation, and various special features of the WSA could benefit from wilderness designation. The same values may be adversely affected by uses and actions that would occur should the WSAs not be designated wilderness. The significance of these beneficial or adverse impacts is an issue for analysis in the EIS.
2. Impacts on Range Management Project Maintenance and Construction. Wilderness designation could affect livestock operations by precluding some planned maintenance and new range management projects necessary for utilization of forage at planned levels. The impact of wilderness designation on the maintenance and construction of range management projects in the WSAs is an issue for analysis in the EIS.
3. Impacts on the Level of Mineral Resource Development. Wilderness designation could affect the development of potential and known mineral resources by withdrawing designated lands from mineral entry. Development of existing mineral resources within designated wilderness areas could be affected by wilderness management restrictions. The impact of wilderness designation on the level of development of potential and known mineral resources is an issue for analysis in the EIS.
4. Impacts on the Level of Recreational Motor Vehicle Use. Wilderness designation would eliminate the public's use of motor vehicles. Eliminating this use would restrict public access into wilderness and could effect the availability of recreation opportunities dependent upon motorized access. The impact of wilderness designation on the level of recreational motor vehicle use is an issue for analysis in the EIS.

JARBIDGE WILDERNESS STUDY AREA LOCATION MAP



IDAHO KEY

MAP 1



WILDERNESS STUDY AREA (WSA) UNITS

UNIT NO.	WSA NAME	ACRES
111 - 17	Bruneau River - Sheep Creek	104,406
17 - 11	Jarbidge River	75,118
19 - 2	King Hill Creek	29,309
TOTAL		208,833

- ☆ STATE CAPITOL
- BLM DISTRICT OFFICE
- 84 INTERSTATE HIGHWAY
- 95 U.S. HIGHWAY
- 67 STATE HIGHWAY
- DISTRICT BOUNDARY
- RESOURCE AREA BOUNDARY
- WILDERNESS STUDY AREA (WSA)

The following issues were identified in scoping, but were not selected for detailed analysis in this EIS. The reasons for setting each of the issues aside are discussed below.

1. Economic Impact on Livestock Operations. Concerns were raised that livestock operators could be required to modify their operations within designated wilderness areas in a manner that would have significant adverse economic impacts on their business. This issue was considered but dropped from detailed analysis because the BLM's wilderness management policy provides for the continued use of wilderness areas for livestock operations at historic levels. Although the management practices of livestock operators in the three WSAs would be more closely regulated, they would continue as they did prior to wilderness designation subject to reasonable controls.
2. Impacts on State and Private Inholdings. The impact of wilderness designation or nondesignation on State or private inholdings in WSAs was identified as an issue in comments on the Draft Jarbidge RMP/EIS. This issue was dropped from further consideration because the uses on these lands would not change as a result of designation or nondesignation. An additional consideration in dropping this issue is the intention of the BLM, at the request of the State of Idaho, to exchange for State land inholdings in designated BLM wilderness areas. Similar voluntary exchanges would be attempted for private land inholdings in areas designated as wilderness.
3. Impacts to Bighorn Sheep. Concerns were raised during the preparation of the Jarbidge RMP that bighorn sheep habitat should be protected under wilderness designation. This concern was not analyzed in detail since habitat protection is provided for through the designation of 84,111 acres as an Area of Critical Environmental Concern (ACEC) in the Jarbidge RMP. Protection of bighorn sheep habitat would occur under all alternatives regardless of wilderness designation.
4. Impacts on Cultural Resources. Inventories and consultation with the State Historic Preservation Officer determined that the Bruneau River - Sheep Creek and Jarbidge River WSAs contain large concentrations of significant cultural resource sites eligible for nomination for listing on the National Register of Historic Places. The King Hill Creek WSA is also expected to contain significant cultural sites. Wilderness designation would place restrictions on scientific excavations and on management actions to stabilize sites deteriorating from natural forces. The impact of wilderness designation on the management of cultural resources will be addressed under the Impacts on Wilderness Values issue since cultural resources are special features within the WSAs.
5. Impacts on Threatened, Endangered, or Sensitive Species. Wildlife and vegetation inventories and consultation with the Idaho Department of Fish and Game and U.S. Fish and Wildlife Service identified the following sensitive species in the WSAs: river otter, bobcat, California bighorn sheep, redband trout, mountain quail, Davis' peppergrass, Bruneau River phlox, and morning milkvetch. Davis'

peppergrass and morning milkvetch are federally listed as Category 2 or candidate species (insufficient data to support listing as either threatened or endangered). There are no known listed threatened or endangered plant or animal species within the WSAs. Management stipulations within the land use plans call for the protection of these species with or without wilderness designation. Therefore, this issue was dropped from further consideration.

THE PLANNING PROCESS, SELECTION OF THE PROPOSED ACTION, AND DEVELOPMENT OF ALTERNATIVES

The Planning Process and Selection of the Proposed Action

Development of the Proposed Action is guided by requirements of the Bureau's Planning Regulations, 43 Code of Federal Regulations (CFR), part 1600. The BLM's Wilderness Study Policy (published February 3, 1982, in the Federal Register) supplements the planning regulations by providing the specific factors to be considered in developing suitability recommendations during the planning sequence.

The Proposed Action recommends as suitable for wilderness designation those portions of WSAs with high quality wilderness values. In addition, the Proposed Action would limit conflicts between the wilderness resource and livestock use, recreational motor vehicle use, and development of potential mineral resources. Under the Proposed Action, 37,540 acres of public land would be recommended suitable for wilderness designation including the canyon rim to rim portions of the Bruneau River - Sheep Creek WSA and the Jarbidge River WSA. The plateau areas of the Bruneau River - Sheep Creek and the Jarbidge River WSAs and the entire King Hill Creek WSA would be recommended nonsuitable for wilderness designation.

Alternatives to the Proposed Action Selected for Analysis

The BLM Wilderness Study Policy calls for the formulation and evaluation of alternatives ranging from resource protection to resource production. The alternatives assessed in this EIS include: No Wilderness, All Wilderness, and Partial Wilderness Alternatives for each WSA. Wild river alternatives for the Bruneau River-Sheep Creek and the Jarbidge River WSAs are also assessed.

In this document, the No Action Alternative, as required by the National Environmental Protection Act, and the No Wilderness Alternative are equivalent. Both alternatives continue management as outlined in existing land use plans, and both recommend the WSAs as nonsuitable for wilderness designation.

The All Wilderness Alternative is the maximum possible acreage that could be recommended as suitable for wilderness designation.

Partial Wilderness Alternatives make suitable or nonsuitable recommendations ranging between the All Wilderness and No Wilderness Alternatives. A

Partial Wilderness Alternative can recommend as suitable for wilderness designation something less than the entire acreage of one WSA.

The Wild River Alternative addresses National Wild River designation of portions of the Bruneau River drainage without wilderness designation.

Alternatives Changed from the Draft to the Final Land Use Plans

The Proposed Action in the approved Jarbidge Resource Management Plan (RMP), which is used as the Proposed Action of this Jarbidge Wilderness EIS, is a change from the Proposed Action of the Draft Jarbidge RMP. The Proposed Action in this EIS contains a wilderness suitability recommendation of 37,540 acres (Bruneau River-Sheep Creek WSA, 20,800 acres; Jarbidge River WSA, 16,740 acres). The Draft Jarbidge RMP contained a wilderness suitability recommendation of 94,199 acres (Bruneau River-Sheep Creek WSA, 17,929 acres; Jarbidge River WSA, 49,881 acres; King Hill Creek WSA, 26,389 acres).

For the Bruneau River-Sheep Creek WSA, the acreage recommended as suitable for wilderness was increased as a result of refinements in boundary definitions and acreage calculations. For the other two WSAs, changes in acreages recommended as suitable for wilderness were the result of reevaluation of the WSAs in relation to the wilderness planning criteria and quality standards contained in the Bureau's Wilderness Study Policy. The specific rationale for the changes is discussed in the following section of this chapter.

For the Jarbidge River and King Hill Creek WSAs, the wilderness suitability recommendations of the Draft RMP were carried forward as partial wilderness alternatives within this EIS. The analysis of environmental consequences contained in this EIS indicates that substantial impacts to wilderness values would not occur due to the changes of wilderness suitability recommendations from the draft to approved (final) land use plan (Jarbidge RMP). Some plateau areas of the Jarbidge River WSA would be subject to management constraints under an Area of Critical Environmental Concern (ACEC) designation to protect the habitat of California bighorn sheep. Management guidelines for the ACEC provide for preservation of habitat, management of livestock and human use in the habitat, and the exclusion of livestock water developments and new roads which would adversely affect bighorn sheep. Motor vehicle use would be limited to designated roads and trails and other wildlife species would also receive management priority.

Selection of Preferred Alternative (Proposed Action)

The wilderness suitability recommendation for the Jarbidge River WSA contained in the Draft Jarbidge RMP was dropped from further consideration in any of the alternatives in the Final EIS for the Jarbidge RMP, but is included as a partial wilderness alternative within this wilderness EIS. The alternatives within the approved Jarbidge RMP and Final EIS contain the following wilderness suitability recommendations:

Alternative A - No Wilderness

Alternative B - Bruneau River/Sheep Creek WSA	- 20,800 acres
Jarbidge River WSA	- 16,740 acres
King Hill Creek WSA	- 26,389 acres
Total Wilderness Suitability	- 63,929 acres
Alternative C - Bruneau River/Sheep Creek WSA	- 20,800 acres
(Preferred Alternative)	
Jarbidge River WSA	- 16,740 acres
King Hill Creek WSA	- 0 acres
Total Wilderness Suitability	- 37,540 acres
Alternative C ₁ - Bruneau River/Sheep Creek WSA	- 20,800 acres
Jarbidge River WSA	- 75,118 acres
King Hill Creek WSA	- 26,389 acres
Total Wilderness Suitability	- 122,307 acres
Alternative D - Bruneau River/Sheep Creek WSA	- 104,406 acres
Jarbidge River WSA	- 75,118 acres
King Hill Creek WSA	- 29,309 acres
Total Wilderness Suitability	- 208,833 acres

In the above, corrections have been made in the partial wilderness alternatives of the Bruneau River-Sheep Creek and Jarbidge River WSAs under Alternatives B, C, and C₁ due to more accurate mapping of proposed wilderness boundaries.

As mentioned in the previous section entitled Alternatives Changed from the Draft to the Final Land Use Plans, wilderness suitability recommendations of the Preferred Alternative for the Jarbidge River and King Hill Creek WSAs were changed from those contained in the Draft Jarbidge RMP for the following reasons:

Jarbidge River WSA

The recommendation for the Jarbidge River WSA was changed from 49,881 acres suitable to 16,740 acres suitable because the entire plateau portion of the WSA was judged to be more valuable for other resource uses, including livestock grazing and semi-primitive motorized recreation activities, primarily hunting and sightseeing which are dependent on motor vehicles. Under wilderness designation, it would be difficult to prevent motor vehicle use on the plateaus because of their relative accessibility and the existence of roads and ways.

It was felt that the plateau area would not add to the quality of the ecosystem representation in the National Wilderness Preservation System (NWPS). The Sagebrush Steppe ecosystem present on the plateaus is being recommended suitable for wilderness designation on eleven other WSAs in southwest Idaho. The ecosystem representation of these other WSAs is of equal or greater quality than that of the plateaus of the Jarbidge River WSA. The Jarbidge River WSA is within a high occurrence area for lightning-caused wildfires. Rehabilitation of burned areas to desirable plant cover would be difficult under a wilderness designation.

The plateau of the WSA would not add significantly to preserving opportunities for solitude and primitive recreation. Other plateau areas of WSAs already recommended for wilderness designation in southwest Idaho have desert type opportunities of equal or greater quality. Likewise, these other WSAs already add sufficiently to the geographical distribution of desert type wilderness areas in the northern Intermountain Basin.

King Hill Creek WSA

The WSA was recommended as unsuitable for wilderness designation because the area was judged by the BLM to be more valuable for optimizing livestock grazing use and for the continuation of other uses including semi-primitive motorized recreation.

The WSA possesses mountainous type terrain which is dissimilar to the relatively flat plateau/sheer-walled canyon landforms of other WSAs recommended for wilderness in southwest Idaho (Owyhee Canyonlands and Jacks Creek Wilderness Study Reports). However, its physical aspect (vegetation/landform) is currently represented in the NWPS by four wilderness areas (as of March 15, 1985).

The King Hill Creek WSA would not add significantly to preserving opportunities for solitude and primitive recreation. The Jarbidge Wilderness Area in northern Nevada and the other WSAs already recommended for wilderness designation in southwest Idaho have desert and semi-desert type opportunities of equal or greater quality. Likewise, the Jarbidge Wilderness Area and these other WSAs already add sufficiently to the geographical distribution of desert/semi-desert type wilderness areas in the northern Intermountain Basin.

CHAPTER 2

PROPOSED ACTION AND ALTERNATIVES

Since the pattern of future actions within the WSAs can't be predicted with certainty, assumptions were made to allow the analysis of impacts under the Proposed Action and alternatives. These assumptions are the basis of the impacts identified in this EIS. They are not management plans or proposals, but represent feasible patterns of activities which could occur under the alternatives analyzed.

To avoid impairment of wilderness values, the three WSAs, in their entirety, will be managed under the provisions of the Interim Management Policy and Guidelines for Lands Under Wilderness Review until Congress acts on the wilderness recommendations.

BRUNEAU RIVER - SHEEP CREEK WSA (ID-111-17)

For the Bruneau River - Sheep Creek WSA, cultural resource management actions would be the same for each alternative. One extensive site district, the boundaries of which encompass approximately 37,000 acres, would be nominated for inclusion on the National Register of Historic Places (NRHP) as stated in the Jarbidge RMP. Approximately 30,000 acres of this site district lie within the Bruneau River - Sheep Creek WSA, including 163 cultural resource sites. Since each site covers approximately 1 acre or less, the actual area to be nominated is about 163 acres spread over a 30,000 acre area. Such a designation does not preclude grazing, range improvements, etc. In addition to nomination of these sites to the NRHP, small fenced exclosures would be installed around seven sites on the plateaus to stop livestock trampling of significant cultural resource sites. Exclosures would be widely separated from each other.

It is anticipated that much of the remnant areas of native vegetation on the plateau would be burned off by wildfires only to be replaced by cheatgrass. The cheatgrass stands would be a continual or persistent fire problem, leading to soil stability problems which would degrade natural values.

To prevent cheatgrass invasion, burned plateau areas would have to be reseeded using motorized equipment to allow adequate and timely seedbed preparation in this dry area. In non-wilderness areas, the use of crested wheatgrass, an introduced species, may be required to effectively suppress the cheatgrass and to allow shrub reinvasion. Such seedings would appear unnatural. Native species would be seeded in designated wilderness areas.

Proposed Action (Partial Wilderness Alternative)

The canyons (rim to rim), 20,800 acres, of the Bruneau River - Sheep Creek WSA would be recommended as suitable for wilderness designation. The plateaus of the WSA, 83,606 acres, would be recommended as nonsuitable for wilderness designation (see Map 2). In addition to the above suitable acres of public lands, 1,080 acres of state and 85 acres of private lands are within the boundary of the suitable area.

Proposed Action and Alternatives

Special Wilderness Features Actions

Vegetation on the plateaus would be manipulated to benefit California bighorn sheep, pronghorn antelope, mule deer, and sage grouse. Manipulation techniques would include prescribed burning and drill seeding or inter-seeding. About 8,500 acres in seven separate locations would be affected (see Map 11). Both native and non-native vegetation would be seeded.

Resource management guidelines identified in the Jarbidge RMP/EIS would protect the plateau portion of the California bighorn sheep habitat (15,000 acres) from incompatible uses as an ACEC. The most important of these guidelines provide for preservation of habitat, management of livestock and human use in the habitat, and the exclusion of livestock water developments and new roads which would adversely affect bighorn sheep. Motor vehicle use would be limited to designated routes on 15,000 acres of plateau within the bighorn sheep habitat. Habitat of other wildlife species would be given management priority.

Livestock Grazing and Range Management Actions

All presently allotted portions of the Bruneau River - Sheep Creek WSA would continue to be allotted for livestock grazing. The approximate amount of livestock use presently allocated within the WSA is:

<u>Allotment</u>	<u>Active Preference</u>
Strickland-Hall-Yates	400
Simplot	1,815
Bruneau Hill	749
Winter Camp	63
Three Creek	955
Total	<u>3,982</u> AUMs

Proposed improvements within the WSA include 1.7 miles of fence, 6,900 acres of reseeding of burned areas, and 3.5 miles of water pipeline bordering the WSA (see Map 11).

In the Bruneau Hill, Winter Camp, and Three Creek Allotments, cattle use would increase by an estimated 173 AUMs over the next 20 years based upon the expectation of mechanical reseeding of about 4,400 acres burned by wildfires on the plateau of the WSA with non-native species. In the Three Creek Allotment, 1.3 miles of new fence within the WSA and 3.5 miles of livestock water pipeline with troughs every two miles bordering the WSA would be built. These projects would allow a 67 AUM increase in the Three Creek Allotment. The pipeline would not be built within one mile of bighorn sheep habitat unless impacts could be mitigated. Within the Bruneau Hill and Winter Camp Allotments, short gap fences would be installed to prevent livestock access into the East Fork Bruneau River canyon.

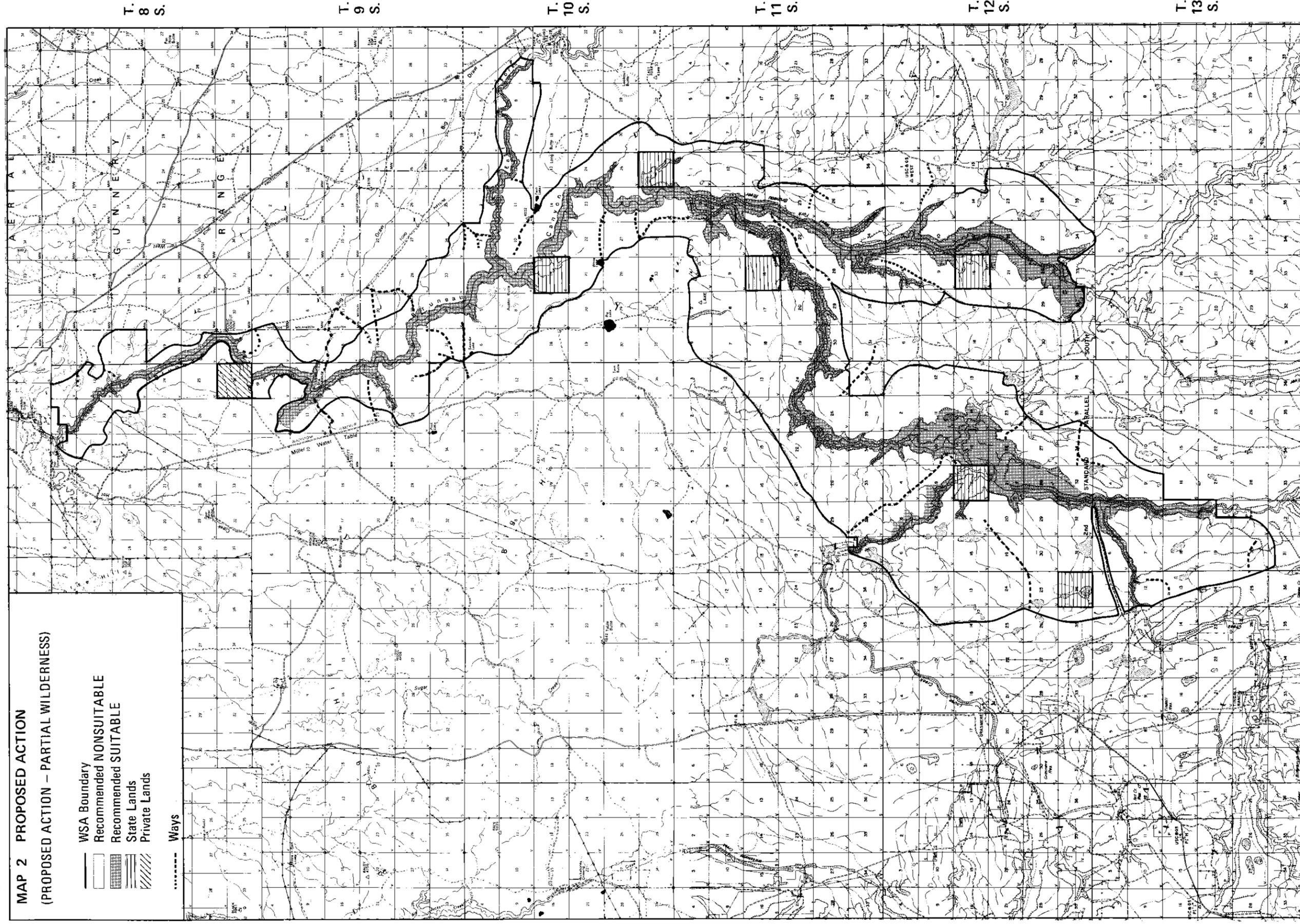
In the Simplot Allotment, 2,500 acres of plateau within the WSA would be mechanically reseeded with non-native species following wildfires to maintain dominance of perennial plants. Potentially, about 260 additional AUMs would be available for livestock grazing based upon production from these fire

BRUNEAU RIVER - SHEEP CREEK WSA ID-1111-17

MAP 2 PROPOSED ACTION
(PROPOSED ACTION - PARTIAL WILDERNESS)

- WSA Boundary
- Recommended NONSUITABLE
- Recommended SUITABLE
- State Lands
- Private Lands

Ways



R. 4 E.

R. 5 E.

R. 6 E.

R. 7 E.

R. 8 E.

T. 8 S.

T. 9 S.

T. 10 S.

T. 11 S.

T. 12 S.

T. 13 S.



Scale in Miles

rehabilitation seedings. In addition, more intensive range management would allow for an increase of 182 AUMs of livestock grazing in 20 years. Four-tenths miles of new fence would be built to improve the integrity of the pasture boundary along Mary's Creek.

Although no new fencing, water projects, or land treatments are proposed for the portion of the Strickland-Hall-Yates Allotment within the WSA, cattle use would increase by 40 AUMs over the next 20 years based upon more intensive management.

Within the WSA, 11 miles of existing fence would be maintained and 19 livestock water impoundments would be periodically cleaned out or repaired.

Mineral Resource Actions

Subject to valid existing rights, the 20,800 acres of the WSA recommended suitable would be withdrawn from all forms of appropriation under the mineral leasing and mining laws. Approximately 100 acres of the portion recommended suitable are covered by mining claims for Bruneau jasper. Approximately 20% of the area is currently disturbed. The disturbance is scattered over the claims and is expected to increase from its present 20% disturbance to 30% disturbance over the next 50 years. Additional disturbance would be limited to small quarries, tailing dumps and primitive roads.

Development of the valid Bruneau jasper claims would continue. All claims would be examined to determine validity. Plans of operations for development of these claims would be processed in accordance with existing regulations. The Bruneau jasper claim area is the only locatable mineral development or claims present within the WSA.

The WSA has low potential for the discovery or development of economic metallic, other non-metallic, or salable mineral development. This BLM determination is based on the limited geologic information available and the lack of industry exploration or development in the area. Therefore, no development of such mineral resources is anticipated.

Although the area is classified as prospectively valuable for oil and gas by BLM, the actual potential is considered to be minimal. There are no active oil and gas leases within the WSA, and no activity has ever occurred on previously leased acres in or near the WSA. Development of oil and gas resources is not anticipated because higher potential areas exist elsewhere.

The Indian Hot Springs area is classified as prospectively valuable for geothermal resources by BLM. No development of this resource has occurred and none is expected due to its isolated location, low temperature, and small probable reservoir size. There are no geothermal leases in the area.

Recreation Management Actions

Within the wilderness there are no roads or ways which would be closed to motor vehicle use by the public. Within the entire WSA, 20,800 acres (the wilderness) would be designated as closed to ORV use; on 15,000 acres, recreational motor vehicle use would be limited to designated roads, ways, and trails; and 68,606 acres would be designated as open to ORV use.

Proposed Action and Alternatives

The plateau areas of the WSA would be available for various semi-primitive motorized recreation activities, while the canyons would be available for primitive recreational opportunities. Recreational boating use of the Bruneau River would be limited within an acceptable level through a permit system.

No recreation facilities presently exist, but future development of facilities outside of the wilderness to satisfy needs associated with whitewater boating would be a possibility.

Management Actions to Exchange for State and Private Inholdings

Action would be initiated to acquire five State land sections and 120 acres of private land through voluntary exchange. The private land is adjacent to the WSA but includes a portion of the Bruneau River canyon within the proposed wilderness.

No Wilderness Alternative

All 104,406 acres of land within the Bruneau River - Sheep Creek WSA would be recommended as nonsuitable for wilderness designation (see Map 3).

Special Wilderness Features Actions

Vegetation on the plateaus would be manipulated to benefit California bighorn sheep, pronghorn antelope, mule deer, and sage grouse. Manipulation techniques would include prescribed burning and drill seeding or inter-seedings. About 8,500 acres in seven separate locations would be affected. Both native and non-native vegetation would be seeded.

Resource management guidelines identified in the Jarbidge RMP/EIS would protect the plateau portion of the California bighorn sheep habitat (15,000 acres) from incompatible uses as an ACEC. The most important of these guidelines provide for preservation of habitat, management of livestock and human use in the habitat, and the exclusion of livestock water developments and new roads which would adversely affect bighorn sheep. Motor vehicle use would be limited to designated routes on 15,000 acres of plateau within the bighorn sheep habitat. Habitat of other wildlife species would be given management priority.

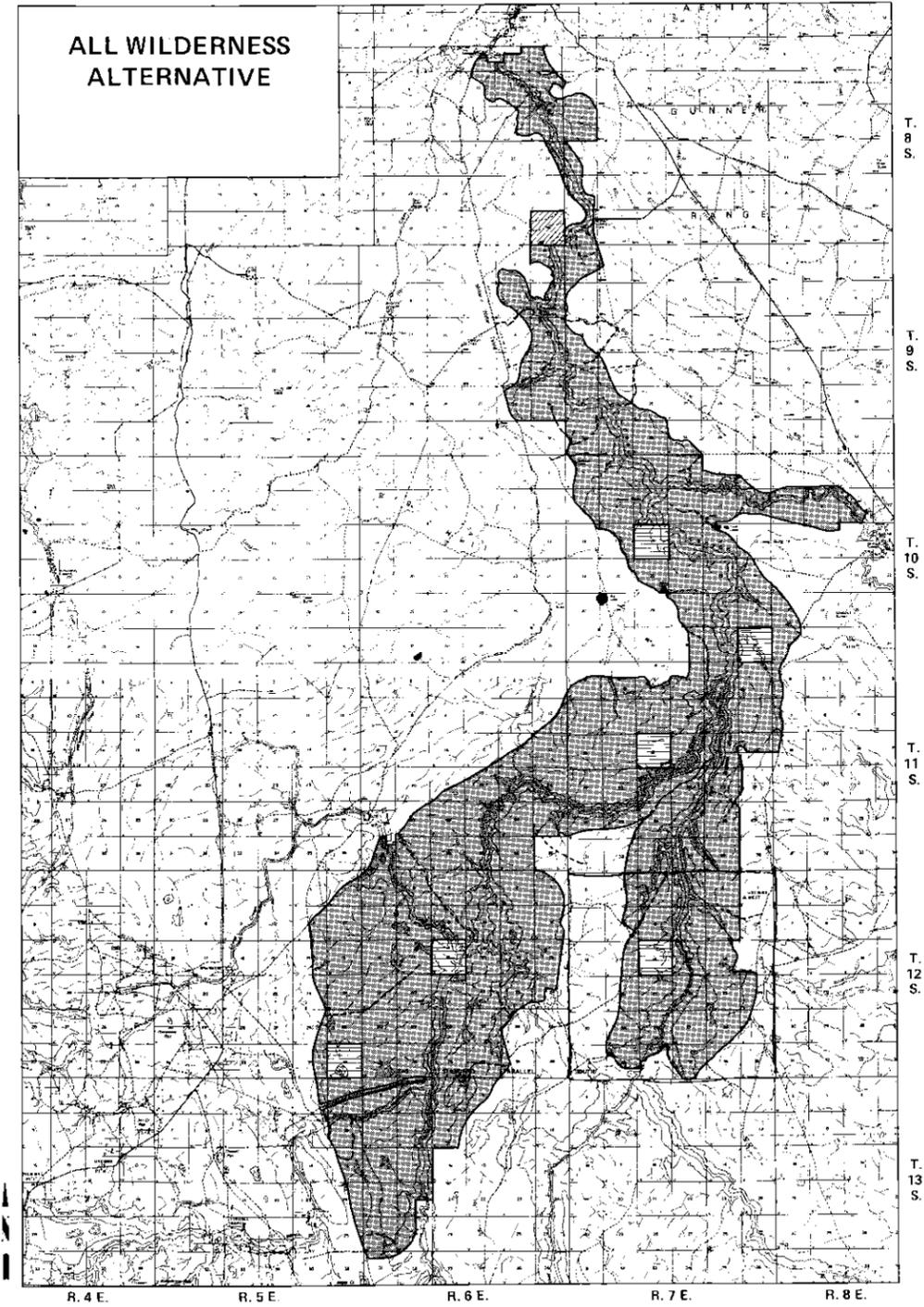
Livestock Grazing and Range Management Actions

All presently allotted portions of the Bruneau River - Sheep Creek WSA would continue to be allotted for livestock grazing. The approximate amount of livestock use presently allocated within the WSA is:

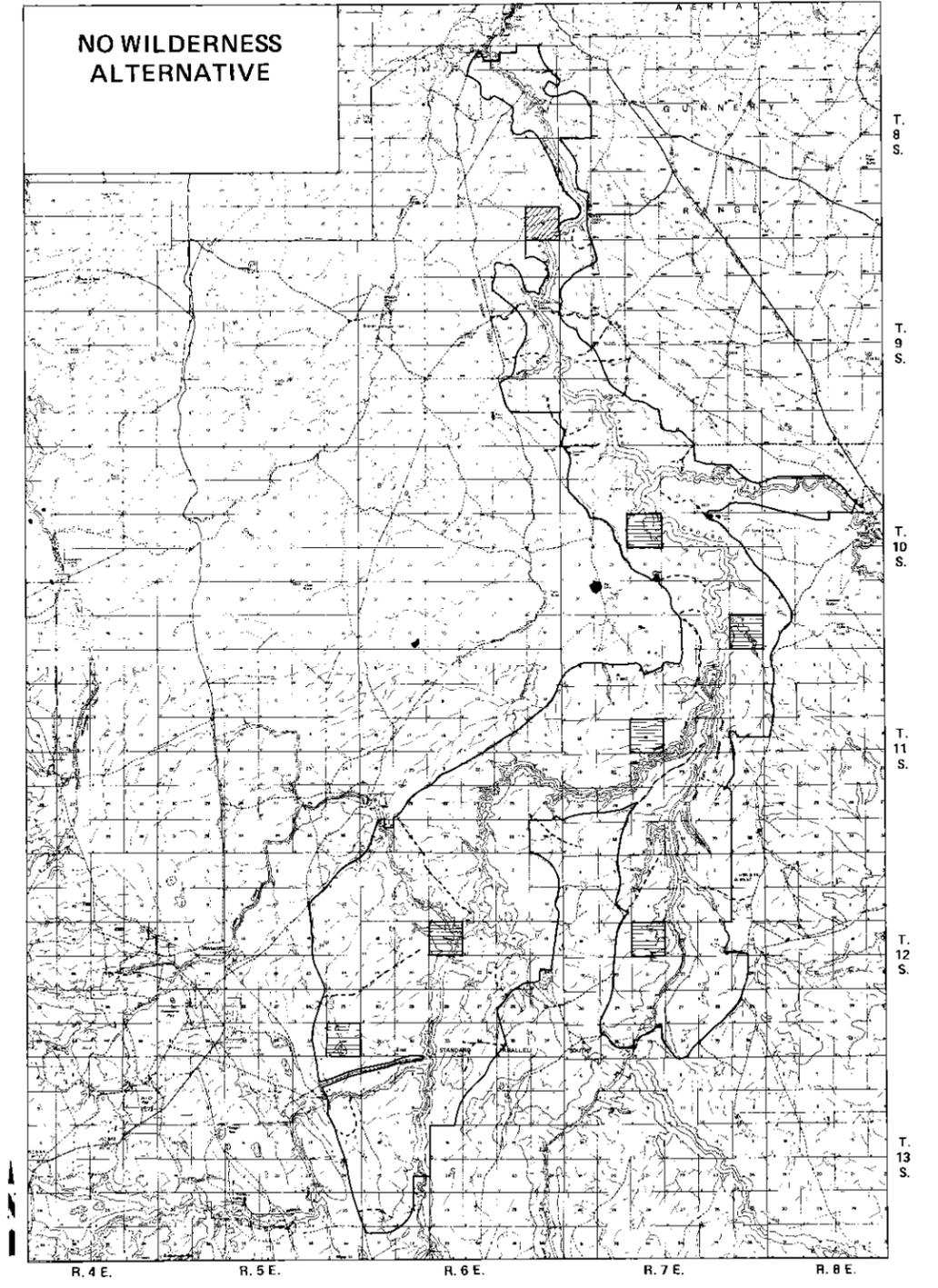
<u>Allotment</u>	<u>Active Preference</u>
Strickland-Hall-Yates	400
Simplot	1,815
Bruneau Hill	749
Winter Camp	63
Three Creek	955
Total	<u>3,982</u> AUMs

MAP 3

BRUNEAU RIVER - SHEEP CREEK WSA ID-111-17



BRUNEAU RIVER - SHEEP CREEK WSA ID-111-17



- WSA Boundary
- Recommended NONSUITABLE
- ▨ Recommended SUITABLE
- S State Lands
- P Private Lands
- V Public Lands
- Ways

Proposed improvements within the WSA include 1.7 miles of fence, 6,900 acres of reseeding burned areas, and 3.5 miles of water pipeline bordering the WSA.

In the Bruneau Hill, Winter Camp, and Three Creek Allotments, cattle use would increase by an estimated 173 AUMs over the next 20 years based upon the expectation of mechanical reseeding of about 4,400 acres burned by wildfires on the plateau of the WSA with non-native species. In the Three Creek Allotment, 1.3 miles of new fence within the WSA and 3.5 miles of livestock water pipeline with troughs every two miles bordering the WSA would be built. These projects would allow a 67 AUM increase in the Three Creek Allotment. The pipeline would not be built within one mile of bighorn sheep habitat unless impacts could be mitigated. Within the Bruneau Hill and Winter Camp Allotments, short gap fences would be installed to prevent livestock access into the East Fork Bruneau River canyon.

In the Simplot Allotment, 2,500 acres of plateau within the WSA would be mechanically reseeded with non-native species following wildfires to maintain dominance of perennial plants. Potentially, about 260 additional AUMs would be available for livestock grazing based upon production from these fire rehabilitation seedings. In addition, more intensive range management would allow for an increase of 182 AUMs of livestock grazing in 20 years. Four-tenths miles of new fence would be built to improve the integrity of the pasture boundary along Mary's Creek.

Although no new fencing, water projects, or land treatments are proposed for the portion of the Strickland-Hall-Yates Allotment within the WSA, cattle use would increase by 40 AUMs over the next 20 years based upon more intensive management.

Within the WSA, 11 miles of existing fence would be maintained and 19 livestock water impoundments would be periodically cleaned out or repaired.

Mineral Resource Actions

Development of the Bruneau jasper mining claims would continue under this alternative. Claims would be examined to determine validity if multiple use conflicts arise. Plans of operation for development would be processed in accordance with existing regulations. New claim activity is likely to occur for placer gold and rock hound type deposits. No valid discoveries are expected. The increase in development in the existing claims is expected to increase from the present 20% disturbance to 30% scattered over the claim area after 50 years. Additional disturbance would be limited to small quarries, tailing dumps and primitive roads.

Due to the isolated location, the lack of a market, and the lack of useable deposits, salable mineral development would not occur.

No drilling for oil and gas would occur due to the low potential for discovery.

No geothermal leasing or development would occur due to the isolated location, low temperature, and small probable reservoir size.

Proposed Action and Alternatives

No withdrawals from all forms of appropriation under the mineral leasing and mining laws would occur.

Recreation Management Actions

Within the canyon, recreation motor vehicle use would be limited to designated roads, ways, and trails on 20,800 acres. On the remainder of the WSA, 68,606 acres would be designated as open to recreational motor vehicle use, and on 15,000 acres motor vehicle use would be limited to designated roads, ways, and trails.

The WSA would be available for various primitive and semi-primitive motorized recreation activities. Recreational float boating use of the Bruneau River would be limited to an acceptable level through a permit system.

The canyons of the Bruneau River and Sheep Creek would be designated as a Special Recreation Management Area (SRMA) and a recreation management plan would be prepared to guide recreation management activities.

Wild River Alternative

Under this alternative, 21 miles of Sheep Creek and 34 miles of the Bruneau River within the Bruneau River - Sheep Creek WSA would be included within the National Wild and Scenic Rivers System and designated as a wild river. This includes a portion of the 121 miles of the Bruneau River and its tributaries (57,000 acres) recommended to Congress in 1976 for inclusion in the System by a joint Federal-State study. The wild river boundary would extend to the uppermost rim on each side of the two main canyons, as squared off along legal subdivisions, and would include about 24,000 acres in the WSA (see Map 4). In addition to this acreage of public land, 1,360 acres of state and 200 acres of private land are included within the wild river boundary. None of the WSA would be recommended as suitable for wilderness.

Special Wilderness Features Actions

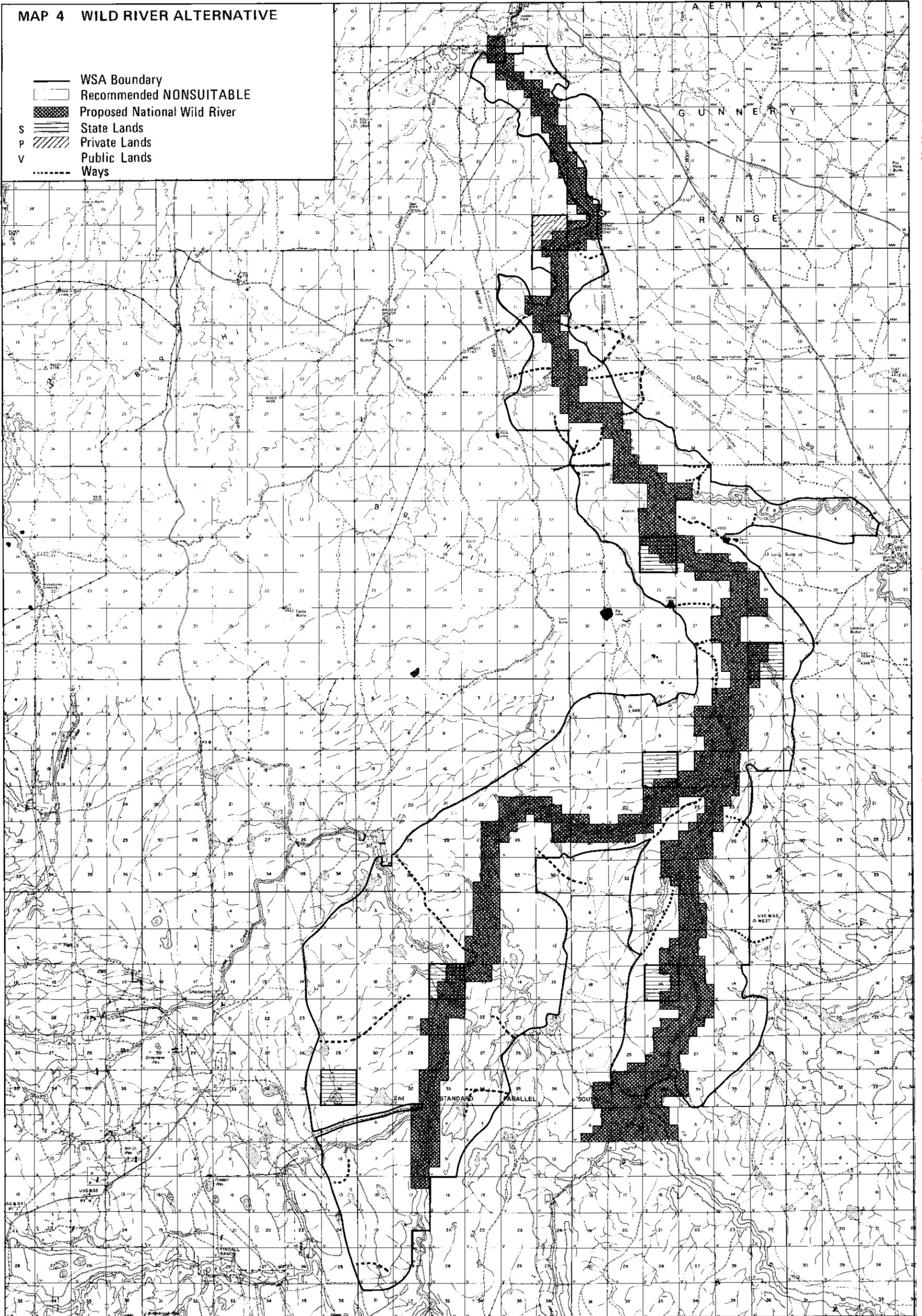
Vegetation on the plateaus would be manipulated to benefit California bighorn sheep, pronghorn antelope, mule deer, and sage grouse. Manipulation techniques would include prescribed burning and drill seeding or interseeding. About 8,500 acres in seven separate locations would be affected. Both native and non-native vegetation would be seeded.

Resource management guidelines identified in the Jarbidge RMP/EIS would protect the plateau portion of the California bighorn sheep habitat (15,000 acres) from incompatible uses as an ACEC. The most important of these guidelines provide for preservation of habitat, management of livestock and human use in the habitat, and the exclusion of livestock water developments and new roads which would adversely affect bighorn sheep. Motor vehicle use would be limited to designated routes on 15,000 acres of plateau within the bighorn sheep habitat. Habitat of other wildlife species would be given management priority.

BRUNEAU RIVER - SHEEP CREEK WSA ID-111-17

MAP 4 WILD RIVER ALTERNATIVE

- WSA Boundary
- Recommended NONSUITABLE
- ▨ Proposed National Wild River
- S State Lands
- P Private Lands
- V Public Lands
- ⋯ Ways



R. 4 E.

R. 5 E.

R. 6 E.

R. 7 E.

R. 8 E.

T. 8 S.

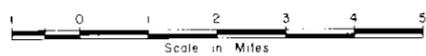
T. 9 S.

T. 10 S.

T. 11 S.

T. 12 S.

T. 13 S.



Livestock Grazing and Range Management Actions

All presently allotted portions of the Bruneau River - Sheep Creek WSA would continue to be allotted for livestock grazing. The approximate amount of livestock use presently occurring within the WSA is:

<u>Allotment</u>	<u>Active Preference</u>
Strickland-Hall-Yates	400
Simplot	1,815
Bruneau Hill	749
Winter Camp	63
Three Creek	955
Total	<u>3,982</u> AUMs

Proposed improvements within the WSA include 1.7 miles of fence, 6,900 acres of reseeding burned areas, and 3.5 miles of water pipeline bordering the WSA.

In the Bruneau Hill, Winter Camp, and Three Creek Allotments, cattle use would increase by an estimated 173 AUMs over the next 20 years based upon the expectation of mechanical reseeding of about 4,400 acres burned by wildfires on the plateau of the WSA with non-native species. In the Three Creek Allotment, 1.3 miles of new fence within the WSA and 3.5 miles of livestock water pipeline with troughs every two miles bordering the WSA would be built. These projects would allow a 67 AUM increase in the Three Creek Allotment. The pipeline would not be built within one mile of bighorn sheep habitat unless impacts could be mitigated. Within the Bruneau Hill and Winter Camp Allotments, short gap fences would be installed to prevent livestock access into the East Fork Bruneau River canyon.

In the Simplot Allotment, 2,500 acres of plateau within the WSA would be mechanically reseeded with non-native species following wildfires to maintain dominance of perennial plants. Potentially, about 260 additional AUMs would be available for livestock grazing based upon production from these fire rehabilitation seedings. In addition, more intensive range management would allow for an increase of 182 AUMs of livestock grazing in 20 years. Four-tenths miles of new fence would be built to improve the integrity of the pasture boundary along Mary's Creek.

Although no new fencing, water projects, or land treatments are proposed for the portion of the Strickland-Hall-Yates Allotment within the WSA, cattle use would increase by 40 AUMs over the next 20 years based upon more intensive management.

Within the WSA, 11 miles of existing fence would be maintained and 19 livestock water impoundments would be periodically cleaned out or repaired.

Mineral Resource Actions

Subject to valid existing rights, the 24,000 acre wild river area would be withdrawn from all forms of appropriation under the mineral leasing and mining laws.

Proposed Action and Alternatives

Development of the valid Bruneau jasper claims would continue. All claims would be examined to determine validity. Plans of operations for development of these claims would be processed in accordance with existing regulations. The Bruneau jasper claim area is the only locatable mineral development or claims present within the WSA. This claim area is expected to increase from the current 20% disturbance to 30% over 50 years. The disturbance is scattered over the claim area. Additional disturbance would be limited to small quarries, tailing dumps and primitive roads.

The WSA has low potential for the discovery or development of metallic, other non-metallic, or salable minerals. Therefore, no development of such mineral resources is anticipated. The potential determination is based on the limited geologic data available and the lack of industry exploration or development.

Although the area is classified as prospectively valuable for oil and gas, the actual potential is considered to be minimal. There are no active oil and gas leases within the WSA, and no activity has ever occurred on previously leased acres in or near the WSA. Development of oil and gas resources is not anticipated because higher potential areas exist elsewhere.

The Indian Hot Springs area is classified as prospectively valuable for geothermal resources. No development of this resource has occurred and none is expected due to its isolated location, low temperature, and small probable reservoir size. There are no geothermal leases in the area.

Recreation Management Actions

As recommended to Congress in a joint federal-state study completed in 1976, the Bruneau River canyon downstream to the mouth of Hot Creek and the Sheep Creek canyon downstream from the confluence of Mary's Creek would be designated by Congress as a National Wild River. A wild river management plan would be prepared to direct management, use, and recreation facility development. No development would occur in the WSA.

Within the WSA, recreation motor vehicle use would be limited to designated roads, ways, and trails on 37,000 acres, and 67,406 acres would be designated as open to ORV use.

The plateaus of the WSA would be available for various semi-primitive motorized recreation activities. The wild river area would provide primitive recreation opportunities. Recreational boating use of the Bruneau River would be limited within an acceptable level through a permit system.

Management Actions to Acquire Private Inholdings

Action would be initiated to acquire a private 200 acre inholding through voluntary exchange.

All Wilderness Alternative

All 104,406 acres of the Bruneau River - Sheep Creek WSA would be recommended as suitable for wilderness designation (see Map 3). In addition

to the above acreage of public land, 3,840 acres of state and 100 acres of private lands are included within the all wilderness boundary.

Special Wilderness Features Actions

No vegetation within the WSA would be manipulated to benefit wildlife habitat.

Livestock Grazing and Range Management Actions

All presently allotted portions of the Bruneau River - Sheep Creek WSA would continue to be allotted for livestock grazing at current levels. The approximate amount of livestock use presently occurring within the WSA is:

<u>Allotment</u>	<u>Active Preference</u>
Strickland-Hall-Yates	400
Simplot	1,815
Bruneau Hill	749
Winter Camp	63
Three Creek	<u>955</u>
Total	3,982 AUMs

Under wilderness designation, structural range improvements and land treatments designed to increase livestock grazing would not occur. New improvements would be intended to protect and effectively manage rangeland resources and wilderness values under existing levels of livestock use. Use of motorized equipment in construction of new range improvements, other than fire rehabilitation, would not occur since timely completion is not as critical to long-term success and serviceability of structural range improvements. Periodic use of motorized vehicles over established routes for maintenance of pre-FLPMA range improvements and in conjunction with existing livestock operations would continue.

Most plateau areas are vulnerable to wildfires and the resulting replacement of the existing shrub-dominated vegetation by a cheatgrass monoculture. The cheatgrass vegetation would not revert to the present plant community. Reseeding of burned areas, utilizing motorized equipment, would be necessary to prevent dominance of annual non-native species and resulting degradation of natural values. About 6,900 WSA acres could be reseeded with native species following wildfires. Such work would only be done if fully justified and then only with the approval of the BLM Director.

In the Three Creek Allotment, 1.3 miles of new fence within the WSA and 3.5 miles of livestock water pipeline with troughs every two miles outside the WSA boundary would be built. The pipeline would not be built within one mile of bighorn sheep habitat unless impacts could be mitigated. These projects would improve cattle distribution.

Within the Bruneau Hill and Winter Camp Allotments, short gap fences would be installed to prevent livestock access into the East Fork Bruneau River canyon.

Proposed Action and Alternatives

In the Simplot Allotment, 0.4 miles of new fence would be installed to improve the integrity of the pasture boundary along Mary's Creek.

Within the WSA, 11 miles of existing fence and 19 livestock water impoundments would be periodically maintained.

Mineral Resource Actions

Subject to valid existing rights, the 104,406 acres of the WSA recommended suitable would be withdrawn from all forms of appropriation under the mineral leasing and mining laws. Approximately 100 acres of the portion recommended suitable are covered by mining claims for Bruneau jasper.

Development of the valid Bruneau jasper claims would continue. All claims would be examined to determine validity. Plans of operations for development of these claims would be processed in accordance with existing regulations. The Bruneau jasper claim area is the only locatable mineral development or claims present within the WSA. The development over 50 years is projected to be 30% surface disturbance scattered over the claim area. Current disturbance is 20% of the claim area. Additional disturbance would be limited to small quarries, tailing dumps and primitive roads.

Recreation Management Actions

The wilderness, 104,406 acres, would be closed to ORV use. Three miles of road and 29 miles of ways within the wilderness would be closed to recreational motor vehicle use.

The wilderness would be open for various primitive recreation activities, while motorized recreational opportunities would be available along all boundary roads and ways. Recreation boating use of the Bruneau River would be limited to an acceptable level through a permit system.

Future development of recreation facilities outside of the wilderness to satisfy needs associated with whitewater boating would be a possibility.

Management Actions to Exchange for State and Private Inholdings

Action would be initiated to acquire six State land sections and 120 acres of private land through voluntary exchange. The private land is adjacent to the WSA, but includes a portion of the Bruneau River canyon included within the All Wilderness Alternative.

Summary of Impacts

Table 2-1 summarizes the impacts of the various alternatives for the Bruneau River - Sheep Creek WSA.

TABLE 2-1
SUMMARY OF IMPACTS
BRUNEAU RIVER - SHEEP CREEK WSA

Environmental Issues	Proposed Action			
	Partial Wilderness Alternative	No Wilderness Alternative	Wild River Alternative	All Wilderness Alternative
Impacts on Wilderness Values including Special Features	The canyons, 20,800 acres (20% of the WSA), designated as wilderness would receive long term Congressional protection. With the exception of a localized loss of naturalness and outstanding opportunities for solitude and primitive recreation occurring on 100 acres of contiguous mining claims from mining activities, all wilderness values in the portions of the WSA which contain the most spectacular scenery and outstanding opportunities for primitive recreation and solitude would be maintained or enhanced. On the 83,606 acres of plateau not designated as wilderness, there would be long-term losses of naturalness on 14,500 acres (15% of WSA) from seedings.	With the exception of localized losses to naturalness and outstanding opportunities for solitude and primitive recreation occurring on 100 acres of mining claims and on other limited sites of mineral exploration work, all wilderness values within the canyon would be retained or enhanced. On the plateaus, long-term losses of naturalness on 15,400 acres would occur (15% of WSA) from seedings.	All wilderness values in 24,000 acres of the WSA (23% of the WSA) that contain the most spectacular scenery and outstanding opportunities for primitive recreation and solitude would receive long term Congressional protect as a wild river. With the exception of localized loss of naturalness and outstanding opportunities for solitude and primitive recreation occurring on 100 acres of contiguous mining claims from mining activities, all wilderness values would be maintained or enhanced in the canyons. On the plateaus, long-term losses of naturalness on 15,400 acres would occur (15% of WSA) from seedings.	All wilderness values would receive long term Congressional protection. With the exception of a localized loss of naturalness and outstanding opportunities for solitude and primitive recreation occurring on 100 acres of contiguous mining claims from mining activities, all wilderness values in the canyons and plateaus would be maintained or enhanced.
Impacts on Range Management Project Maintenance and Construction	There would be no impact on range project maintenance and construction. A 722 AUM (18%) increase in livestock use would occur. Proposed projects include 3.5 miles of pipeline and 1.7 miles of fence.	There would be no impact on range project maintenance and construction. A 722 AUM (18%) increase in livestock use would occur. Proposed projects include 3.5 miles of pipeline and 1.7 miles of fence.	There would be no impact on range project maintenance and construction. A 722 AUM (18%) increase in livestock use would occur. Proposed projects include 3.5 miles of pipeline and 1.7 miles of fence.	The cost in terms of time and inconvenience of constructing new fences and of maintaining post-FLEPA (October 21, 1986) projects would approximately double. There would be no impact on the current level of livestock use. Proposed projects include 3.5 miles of pipeline and 1.7 miles of fence.
Impacts on Development of Mineral Resources	Potential mineral resources on 83,606 acres would be available for development. Exclusive of the Bruneau jasper claims, the WSA has low potential for development of mineral resources. Impacts of withdrawal of 20,800 acres from mineral entry and mineral leasing would be insignificant since no development is projected.	Potential mineral resources would be available for development. Exclusive of the Bruneau jasper claims, the WSA has low potential for development of mineral resources. There would be no impact on mineral resource development.	Potential mineral resources would be available for development on 80,406 acres. Exclusive of the Bruneau jasper claims, the WSA has low potential for development of mineral resources. Impacts of withdrawal of 24,000 acres from mineral entry and mineral leasing would be insignificant since no development is projected.	With the exception of valid existing rights, potential mineral resources would not be available for development. The potential for the development of any additional mineral resources is low. Impacts of withdrawal of 104,406 acres from mineral entry and mineral leasing would be insignificant since no development is projected.
Impacts on Recreational Motor Vehicle Use	On the portion of the WSA accessible by motor vehicles, 68,606 acres (66% of WSA) would remain open to ORV use, and on 15,000 acres (14% of WSA), motor vehicle use would be allowed only on designated routes with minimal impact. Closing 20,800 acres (20% of WSA) in the inaccessible canyon would have no impact. Recreational motor vehicle use would increase from the current 150 visitor days to 300 visitor days.	On the portion of the WSA accessible by motor vehicles, 68,606 acres (66% of WSA) would remain open to ORV use, and on 15,000 acres (14% of WSA), motor vehicle use would be allowed only on designated routes with minimal impact. Limiting use on 20,800 acres (20% of WSA) in the inaccessible canyon would have no impact. Recreational motor vehicle use would increase from the current 150 visitor days to 300 visitor days.	On the portion of the WSA accessible by motor vehicles, 67,406 acres (65% of WSA) would remain open to ORV use, and on 13,000 acres (12% of WSA), motor vehicle use would be allowed only on designated routes with minimal impact. Limiting use on 24,000 acres (23% of WSA) in the inaccessible canyon would have no impact. Recreational motor vehicle use would increase from the current 150 visitor days to 300 visitor days.	The entire area would be closed to motor vehicle use. Recreational motor vehicle use would increase from the current 150 visitor days to 200 visitor days. This use would occur along the boundary of the WSA. 100 visitor days would be foregone annually. The impacts of shifting use to adjacent public land would be negligible.

JARBIDGE RIVER WSA (ID-17-11)

For the Jarbidge River WSA, cultural resource management actions would be the same for each alternative. One extensive site district, the boundaries of which encompass approximately 37,000 acres would be nominated for inclusion on the National Register of Historic Places as stated in the Jarbidge RMP. Approximately 6,000 acres of this site district lie within the Jarbidge River WSA, including 40 cultural resource sites. Since each site covers approximately 1 acre or less, the actual area to be nominated is about 40 acres spread over a 6,000 acre area. Such a designation does not preclude grazing, range improvements, etc. In addition to nomination of these sites to the NRHP, a small fenced enclosure, no larger than 500 square feet, would be installed around one site on the plateau to stop livestock trampling of a significant cultural resource site.

It is anticipated that much of the remnant areas of native vegetation on the plateau would be burned off by wildfires only to be replaced by cheatgrass. The cheatgrass stands would be a continual or persistent fire problem, leading to soil stability problems which would degrade natural values.

To prevent cheatgrass invasion, burned plateau areas would have to be reseeded using motorized equipment to allow adequate and timely seedbed preparation in this dry area. In non-wilderness areas, the use of crested wheatgrass, an introduced species, may be required to effectively suppress the cheatgrass and to allow shrub reinvasion. Such seedings would appear unnatural. Native species would be seeded in designated wilderness areas.

Proposed Action (Partial Wilderness Alternative)

The canyons (rim to rim), 16,740 acres, of the Jarbidge River WSA would be recommended as suitable for wilderness designation. The plateaus of the WSA, 58,378 acres, would be recommended as nonsuitable for wilderness designation (see Map 5). In addition to the above suitable acres of public land, 690 acres of state and 80 acres of private lands are within the boundary of the suitable area.

Special Wilderness Features Actions

Vegetation on the plateaus would be manipulated to benefit California bighorn sheep, pronghorn antelope, mule deer, and sage grouse. Manipulation techniques would include prescribed burning and drill seeding or interseeding. About 6,100 acres in four separate locations would be affected (see Map 12). Both native and non-native vegetation would be seeded.

Resource management guidelines identified in the Jarbidge RMP/EIS would protect the plateau portion of the California bighorn sheep habitat (41,590 acres) from incompatible uses as an ACEC. The most important of these guidelines provide for preservation of habitat, management of livestock and human use in the habitat, and the exclusion of livestock water developments and new roads which would adversely affect bighorn sheep. On 41,590 acres of plateau within the bighorn sheep habitat, motor vehicle use would be limited

Proposed Action and Alternatives

to designated routes. Habitat of other wildlife species would be given management priority.

Livestock Grazing and Range Management Actions

All presently allotted portions of the Jarbidge River WSA would continue to be allotted for livestock grazing. The approximate amount of livestock use presently occurring within the WSA is:

<u>Allotment</u>	<u>Active Preference</u>
Alzola	173
Simplot	193
Three Creek	212
Poison Creek	1,482
Diamond A	<u>2,777</u>
Total	<u>4,837</u> AUMs

Proposed improvements within the WSA include 8,900 acres of seeding, 1,800 acres of brush control, six miles of fence, 1.4 miles of water pipeline, and the development of two reservoirs and one spring (see Map 12).

In the next 20 years, cattle use within the Bruneau Canyon portion of the Alzola Allotment would increase by 17 AUMs due to more intensive management.

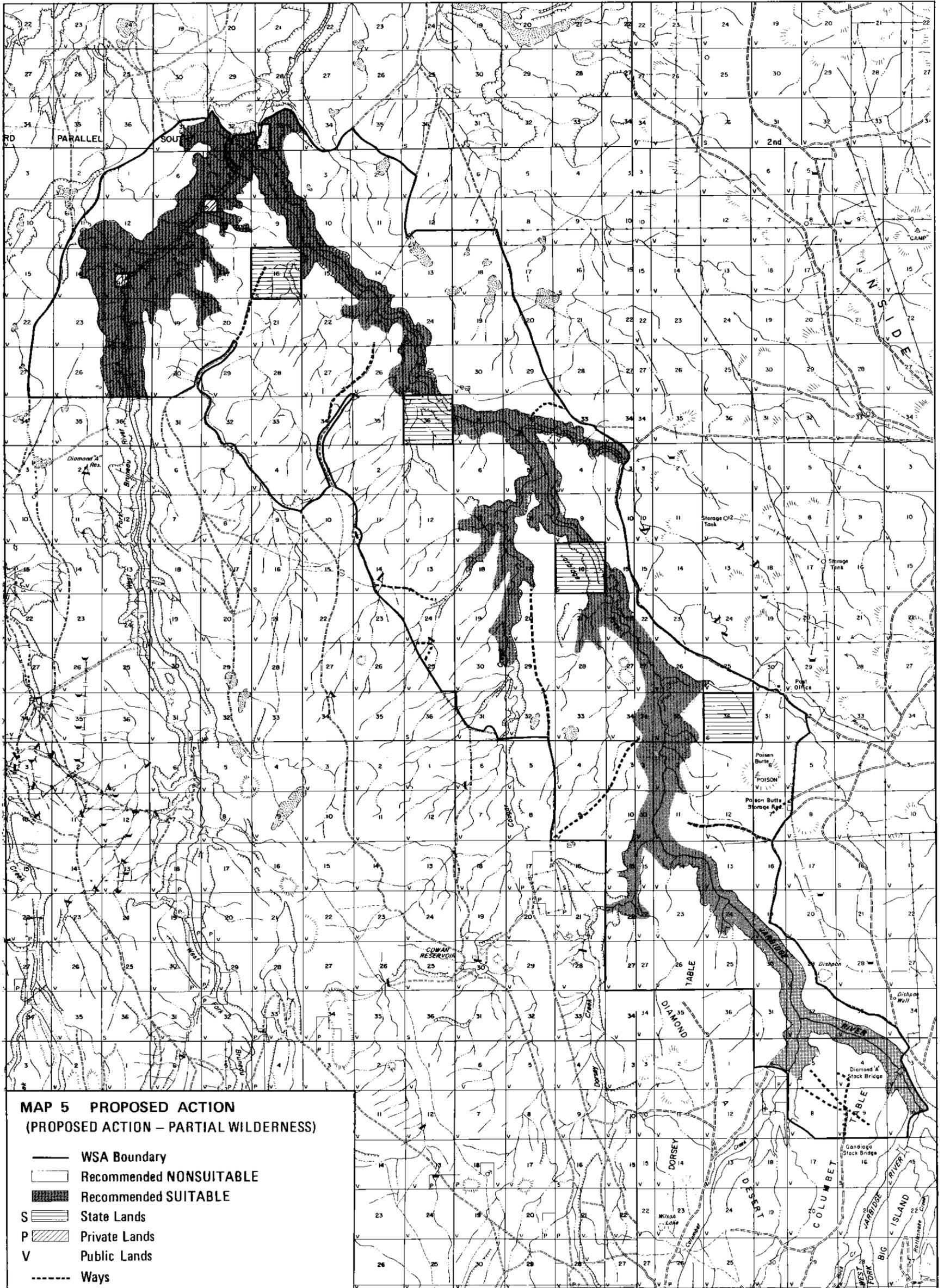
In the Simplot Allotment, 1,000 acres could be mechanically reseeded with non-native species following wildfires. This would yield about 159 AUMs of additional livestock forage. In addition, a 19 AUM increase in cattle use is expected over the next 20 years based on more intensive management.

Cattle and horse use on the Three Creek, Poison Creek, and Diamond A Allotments would increase by an estimated 265 AUMs over the next 20 years based upon the expectation of mechanical reseeded of about 6,400 acres burned by wildfires in the WSA using non-native species. Shallow or stony soils, shadscale range sites, and cultural sites would generally limit the amount of reseeded which could be done within the bighorn sheep ACEC, but some areas could be reseeded to prevent cheatgrass dominance following wildfires.

In the Poison Creek Allotment, three miles of new fencing and 0.6 miles of new water pipeline would be constructed to improve cattle distribution and management. An existing 1,800 acre seeding may receive treatment for sagebrush reinvasion.

Two reservoirs and one spring would be developed and 0.8 mile of pipeline would be constructed in the Diamond A Allotment to improve livestock distribution. Up to 1,500 acres would be burned and mechanically seeded with non-native species for a 68 AUM increase in cattle use. Three miles of gap fences would be constructed to prevent cattle use in the Jarbidge River canyon. Fences installed in the canyon bottom would be located and designed so as not to impede whitewater boating.

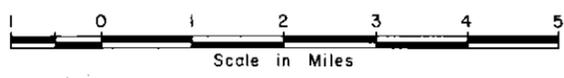
JARBIDGE RIVER WSA ID-17-11



MAP 5 PROPOSED ACTION
(PROPOSED ACTION - PARTIAL WILDERNESS)

- WSA Boundary
- Recommended NONSUITABLE
- ▨ Recommended SUITABLE
- S State Lands
- P Private Lands
- V Public Lands
- - - Ways

R. 6 E. R. 7 E. R. 8 E. R. 9 E.



T. 12 S.
T. 13 S.
T. 14 S.
T. 15 S.
T. 16 S.

New structural range improvements and implementation of new AMPs and the Coordinated Resource Management Plan (CRMP) would allow an estimated 210 AUM increase in cattle use in the Three Creek, Poison Creek, and Diamond A Allotments.

Eight existing livestock water impoundments, 3.8 miles of existing fence, and 2 existing stock bridges would be periodically maintained.

Mineral Resource Actions

Subject to valid existing rights, the 16,740 acres of the WSA recommended suitable would be withdrawn from all forms of appropriation under the mineral leasing and mining laws. Approximately five acres of the portion recommended suitable are covered by mining claims for Bruneau jasper and other hobby collecting minerals.

Development of the valid Bruneau jasper claims would continue adjacent to the WSA. All claims would be examined to determine validity. Plans of operations for development of these claims would be processed in accordance with existing regulations. The Bruneau jasper claim area is the only locatable mineral development or claims present within the WSA. No new disturbance is expected on these claims within the WSA. Present disturbance is less than 1% of the claim area involved.

The WSA has low potential for the discovery or development of economic metallic, other non-metallic minerals, or salable minerals. This is based on the minimal geologic data available and the lack of industry exploration or development. Therefore, no development of such mineral resources is anticipated.

Although the area is classified as prospectively valuable for oil and gas by BLM, the actual potential is considered to be minimal. There are no active oil and gas leases within the WSA, and no activity has ever occurred on previously leased acres in or near the WSA. Development of oil and gas resources is not anticipated because higher potential areas exist elsewhere.

The Indian Hot Springs and Murphy Hot Springs areas are classified as prospectively valuable for geothermal resources by BLM. No further development of these resources is expected due to isolated locations, low temperatures, and small probable reservoir sizes. There are no geothermal leases in the area.

Recreation Management Actions

Within the wilderness, one mile of cherrystem road would be closed to motor vehicle use by the public. Within the entire WSA, 16,740 acres (the wilderness) would be designated as closed to ORV use; on 41,590 acres, recreational motor vehicle use would be limited to designated roads, ways, and trails; and 16,788 acres would be designated as open to ORV use.

The plateau areas of the WSA would be available for semi-primitive motorized recreation activities, while the canyons would be available for primitive recreation opportunities. Recreational boating use of the

Proposed Action and Alternatives

Jarbidge and West Fork Bruneau Rivers would be limited to an acceptable level through a permit system.

No recreational facilities exist within the WSA, but future development of facilities outside of the wilderness to satisfy needs associated with whitewater boating, fishing, and hunting would be a possibility.

Management Actions to Exchange for State and Private Inholdings

Action would be initiated to acquire two 40-acre private land inholdings and three State land sections through voluntary exchange.

No Wilderness Alternative

All 75,118 acres of land within the Jarbidge River WSA would be recommended as nonsuitable for wilderness designation (see Map 6).

Special Wilderness Features Actions

Vegetation on the plateaus would be manipulated to benefit California bighorn sheep, pronghorn antelope, mule deer, and sage grouse. Manipulation techniques would include prescribed burning and drill seeding or interseeding. About 6,100 acres in four separate locations would be affected. Both native and non-native vegetation would be seeded.

Resource management guidelines identified in the Jarbidge RMP/EIS would protect the plateau portion of the California bighorn sheep habitat (41,590 acres) from incompatible uses as an ACEC. The most important of these guidelines provide for preservation of habitat, management of livestock and human use in the habitat, and the exclusion of livestock water developments and new roads which would adversely affect bighorn sheep. On 41,590 acres of plateau within the bighorn sheep habitat, motor vehicle use would be limited to designated routes. Habitat of other wildlife species would be given management priority.

Livestock Grazing and Range Management Actions

All presently allotted portions of the Jarbidge River WSA would continue to be allotted for livestock grazing. The approximate amount of livestock use presently occurring within the WSA is:

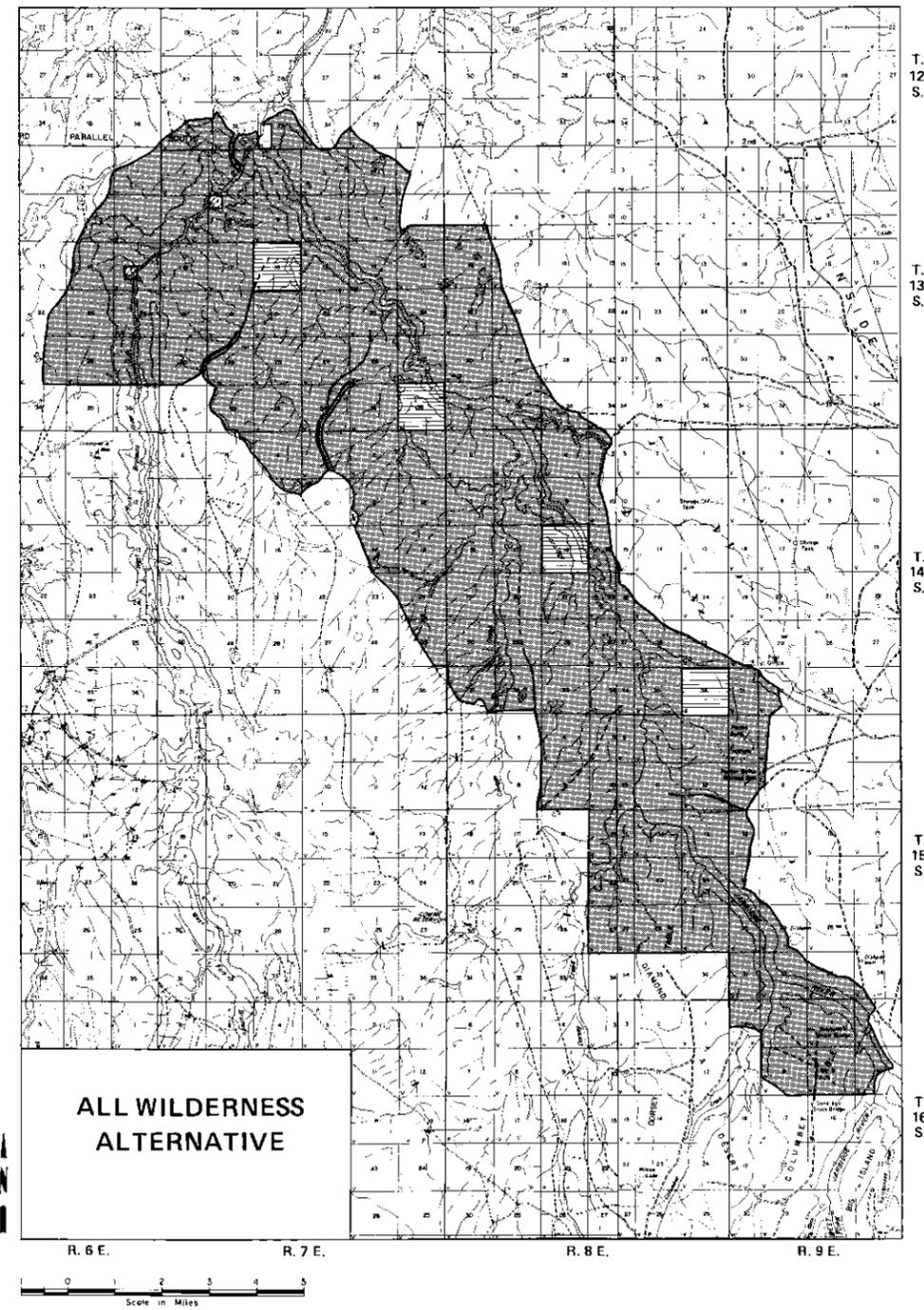
<u>Allotment</u>	<u>Active Preference</u>
Alzola	173
Simplot	193
Three Creek	212
Poison Creek	1,482
Diamond A	<u>2,777</u>
Total	4,837 AUMs

Proposed improvements within the WSA include 8,900 acres of seedings, 1,800 acres of brush control, six miles of fence, 1.4 miles of water pipeline, and the development of two reservoirs and one spring (see Map 12).

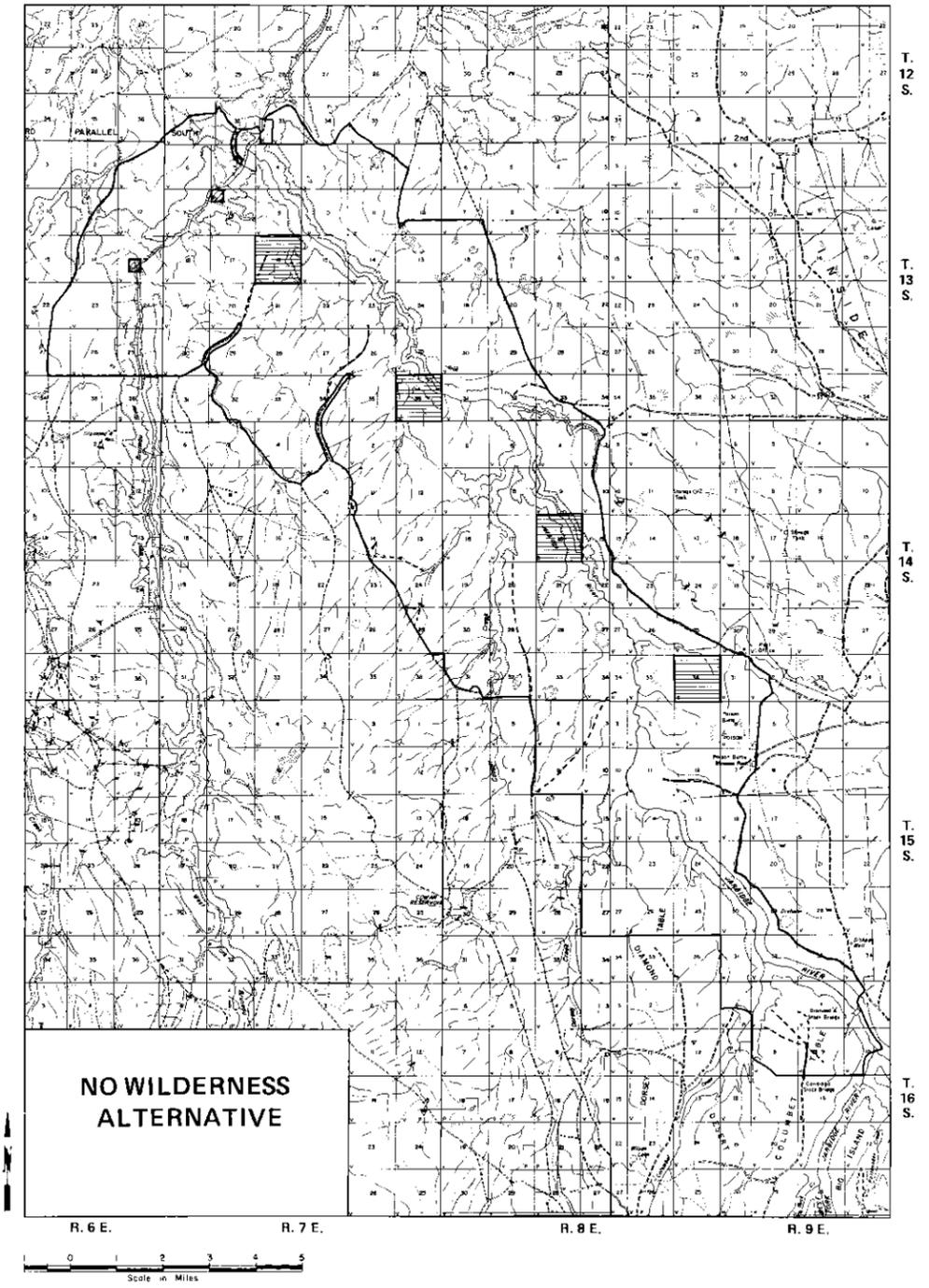
MAP 6

- WSA Boundary
- Recommended NONSUITABLE
- ▨ Recommended SUITABLE
- S State Lands
- P Private Lands
- V Public Lands
- Ways

JARBIDGE RIVER WSA ID-17-11



JARBIDGE RIVER WSA ID-17-11



In the next 20 years, cattle use within the Bruneau Canyon portion of the Alzola Allotment would increase by 17 AUMs due to more intensive management.

In the Simplot Allotment, 1,000 acres could be mechanically reseeded with non-native species following wildfire. This would yield about 159 AUMs of additional livestock forage. In addition, a 19 AUM increase in cattle use is expected over the next 20 years based on more intensive management.

Cattle and horse use on the Three Creek, Poison Creek, and Diamond A Allotments would increase by an estimated 265 AUMs over the next 20 years based upon the expectation of mechanical reseeding of about 6,400 acres burned by wildfires in the WSA using non-native species. Shallow or stony soils, shadscale range sites, and cultural sites would generally limit the amount of reseeding which could be done within the bighorn sheep ACEC, but some areas could be reseeded to prevent cheatgrass dominance following wildfires.

In the Poison Creek Allotment, three miles of new fencing and 0.6 miles of new water pipeline would be constructed to improve cattle distribution and management. An existing 1,800 acre seeding may receive treatment for sagebrush reinvasion.

Two reservoirs and one spring would be developed and 0.8 mile of pipeline would be constructed in the Diamond A Allotment to improve livestock distribution. Up to 1,500 acres would be burned and mechanically seeded with non-native species for a 68 AUM increase in cattle use. Three miles of gap fences would be constructed to prevent cattle use in the Jarbridge River canyon. Fences installed in the canyon bottom would be located and designed so as not to impede whitewater boating.

New structural range improvements and implementation of new AMPs and the Coordinated Resource Management Plan (CRMP) would allow an estimated 210 AUM increase in cattle use in the Three Creek, Poison Creek, and Diamond A Allotments.

Eight existing livestock water impoundments, 3.8 miles of existing fence, and 2 existing stock bridges would be periodically maintained.

Mineral Resource Actions

Development of the Bruneau jasper mining claims would continue adjacent to the WSA. Claims would be examined to determine validity if multiple use conflicts arise. Plans of operations for development would be processed in accordance with existing regulations. The Bruneau jasper claim area is the only locatable mineral development or claims present within the WSA. No new disturbance is expected on these claims within the WSA. Present disturbance is less than 1% of the claim area involved.

Due to the isolated location, the lack of a market, and the lack of useable deposits, salable mineral development would not occur. Some exploration and claim activity may occur for hobby minerals and placer gold, but no valid discoveries are expected.

No drilling for oil and gas would occur due to the low potential for discovery.

Proposed Action and Alternatives

No geothermal leasing or development would occur due to the isolated location, low temperature, and small probable reservoir size.

No mineral withdrawals would occur.

Recreation Management Actions

Within the WSA, recreation motor vehicle use would be limited to designated roads, ways, and trails on 58,330 acres. The remainder of the WSA, 16,788 acres, would be designated as open to recreational motor vehicle use.

The WSA would be available for various primitive and semi-primitive motorized recreation activities. Recreational boating use of the Jarbidge and West Fork Bruneau Rivers would be limited to an acceptable level through a permit system.

The Jarbidge River and West Fork Bruneau River canyons would be designated as a Special Recreation Management Area (SRMA), and a recreation management plan would be prepared to guide recreation management activities.

Wild River Alternative

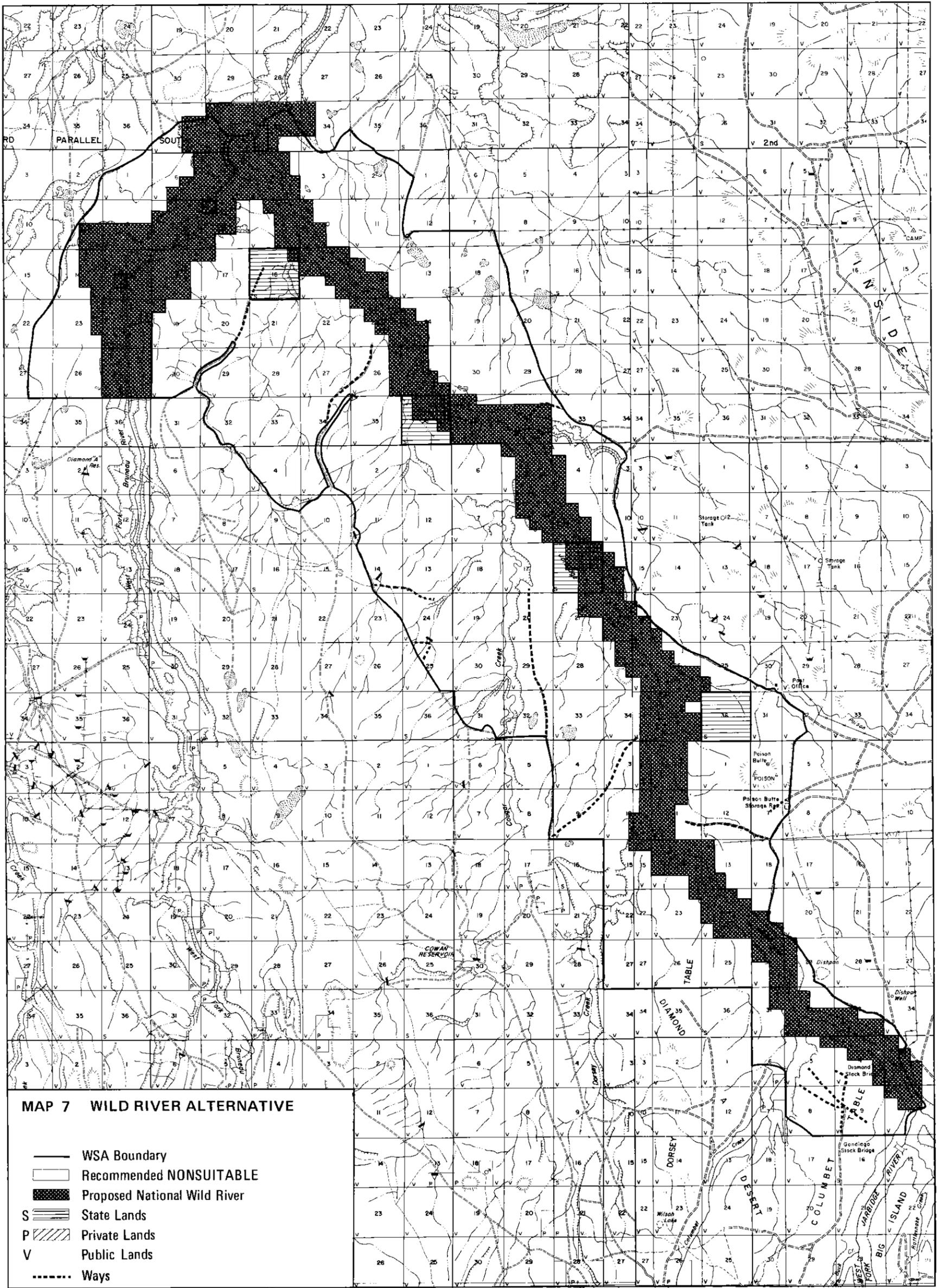
Under this alternative, 29 miles of the Jarbidge River, a 0.5 mile section of the Bruneau River, and 6 miles of the West Fork Bruneau River within the Jarbidge River WSA would be included within the National Wild and Scenic Rivers System and designated as a wild river. This includes a portion of the 121 miles of the Bruneau River and its tributaries (57,000 acres) recommended to Congress in 1976 for inclusion in the system by a joint Federal-State study. The wild river boundary would extend to the uppermost rim on each side of the two main canyons, as squared off along legal subdivisions, and would include 18,800 acres in the WSA (see Map 7). In addition to this acreage of public land, 720 acres of state and 80 acres of private lands are within the wild river boundary. None of the WSA would be recommended as suitable for wilderness designation.

Special Wilderness Features Actions

Vegetation on the plateaus would be manipulated to benefit California bighorn sheep, pronghorn antelope, mule deer, and sage grouse. Manipulation techniques would include prescribed burning and drill seeding or interseeding. About 6,100 acres in four separate locations would be affected. Both native and non-native species would be planted.

Resource management guidelines identified in the Jarbidge RMP/EIS would protect the plateau portion of the California bighorn sheep habitat (41,590 acres) from incompatible uses as an ACEC. The most important of these guidelines provide for preservation of habitat, management of livestock and human use in the habitat, and the exclusion of livestock water developments and new roads which would adversely affect bighorn sheep. On 41,590 acres of plateau within bighorn sheep habitat, motor vehicle use would be limited to designated routes. Habitat of other wildlife species would be given management priority.

JARBIDGE RIVER WSA ID-17-11



T. 12 S.

T. 13 S.

T. 14 S.

T. 15 S.

T. 16 S.

MAP 7 WILD RIVER ALTERNATIVE

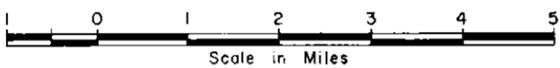
- WSA Boundary
- ▭ Recommended NONSUITABLE
- ▨ Proposed National Wild River
- S▨ State Lands
- P▨ Private Lands
- V Public Lands
- ⋯ Ways

R. 6 E.

R. 7 E.

R. 8 E.

R. 9 E.



Livestock Grazing and Range Management Actions

All presently allotted portions of the Jarbidge River WSA would continue to be allotted for livestock grazing. The approximate amount of livestock use presently occurring within the WSA is:

<u>Allotment</u>	<u>Active Preference</u>
Alzola	173
Simplot	193
Three Creek	212
Poison Creek	1,482
Diamond A	<u>2,777</u>
Total	4,837 AUMs

Proposed improvements in the WSA include 8,900 acres of seeding, 1,800 acres of brush control, six miles of fence, 1.4 miles of water pipeline, and the development of two reservoirs and one spring.

In the next 20 years, cattle use within the Bruneau Canyon portion of the Alzola Allotment would increase by 17 AUMs due to more intensive management.

In the Simplot Allotment, 1,000 acres could be mechanically reseeded with non-native species following wildfire. This would yield about 159 AUMs of additional livestock forage. In addition, a 19 AUM increase in cattle use is expected over the next 20 years based on more intensive management.

Cattle and horse use on the Three Creek, Poison Creek, and Diamond A Allotments would increase by an estimated 265 AUMs over the next 20 years based upon the expectation of mechanical reseeding of about 6,400 acres burned by wildfires in the WSA using non-native species. Shallow or stony soils, shadscale range sites, and cultural sites would generally limit the amount of reseeding which could be done within the bighorn sheep ACEC, but some areas could be reseeded to prevent cheatgrass dominance following wildfires.

In the Poison Creek Allotment, three miles of new fencing and 0.6 miles of new water pipeline would be constructed to improve cattle distribution and management. An existing 1,800 acre seeding may receive treatment for sagebrush reinvasion.

Two reservoirs and one spring would be developed and 0.8 mile of pipeline would be constructed in the Diamond A Allotment to improve livestock distribution. Up to 1,500 acres would be burned and mechanically seeded with non-native species for a 68 AUM increase in cattle use. Three miles of gap fences would be constructed to prevent cattle use in the Jarbidge River canyon. Fences installed in the canyon bottom would be located and designed so as not to impede whitewater boating.

New structural range improvements and implementation of new AMPs and the Coordinated Resource Management Plan (CRMP) would allow an estimated 210 AUM increase in cattle use in the Three Creek, Poison Creek, and Diamond A Allotments.

Proposed Action and Alternatives

Eight existing livestock water impoundments, 3.8 miles of existing fence, and two existing stock bridges would be periodically maintained.

Mineral Resource Actions

Subject to valid existing rights, the 18,800 acres of the WSA designated as wild river would be withdrawn from all forms of appropriation under the mineral leasing and mining laws. Approximately five acres of the portion recommended suitable are covered by mining claims for Bruneau jasper and other hobby collecting minerals.

Development of the valid Bruneau jasper claims would continue adjacent to the WSA. All claims would be examined to determine validity. Plans of operations for development of these claims would be processed in accordance with existing regulations. The Bruneau jasper claim area is the only locatable mineral development or claims present within the WSA. No new disturbance is expected on these claims within the WSA. Present disturbance is less than 1% of the claim area involved.

The WSA has low potential for the discovery or development of economic metallic, other non-metallic, or salable minerals. This is based on the minimal geological data available and the lack of industry exploration or development. Therefore, no development of such mineral resources is anticipated.

Although the area is classified as prospectively valuable for oil and gas by BLM, the actual potential is considered to be minimal. There are no active oil and gas leases within the WSA, and no activity has ever occurred on previously leased acres in or near the WSA. Development of oil and gas resources is not anticipated because higher potential areas exist elsewhere.

The Indian Hot Springs and Murphy Hot Springs areas are classified as prospectively valuable for geothermal resources by BLM. No further development of these resources is expected due to isolated locations, low temperatures, and small probable reservoir sizes. There are no leases in the area.

Recreation Management Actions

As recommended to Congress in a joint federal-state study completed in 1976, the portions of the Jarbidge, Bruneau, and West Fork Bruneau River canyons within the WSA would be designated by Congress as National Wild Rivers. A wild river management plan would be prepared to direct management, use, and recreation facility development. No development would occur in the WSA.

Within the WSA, recreation motor vehicle use would be limited to designated roads, ways, and trails on 58,330 acres, and 16,788 acres would be designated as open to ORV use.

The plateaus of the WSA would be available for semi-primitive motorized recreation activities, while the wild river area would be available for primitive recreation opportunities. Recreational boating use of the

Jarbidge and West Fork Bruneau Rivers would be limited to an acceptable level through a permit system.

Management Actions to Exchange for Private Inholdings

Action would be initiated to acquire two 40-acre private inholdings through voluntary exchange.

Partial Wilderness Alternative

The canyons and a portion of the plateau of the Jarbidge River WSA, 49,881 acres, would be recommended as suitable for wilderness designation. A portion of the plateaus within the WSA, 25,237 acres, would be recommended as nonsuitable for wilderness designation (see Map 8). In addition to the above acreage of suitable public land, 1,900 acres of state and 80 acres of private lands are within the partial wilderness boundary.

Special Wilderness Features Actions

Vegetation on the plateaus to the east of the Jarbidge River would be manipulated to benefit California bighorn sheep, pronghorn antelope, mule deer, and sage grouse. Manipulation techniques would include prescribed burning and drill seeding or interseeding. About 2,200 acres in two separate locations would be affected. Both native and non-native vegetation would be planted.

Resource management guidelines identified in the Jarbidge RMP/EIS would protect the plateau portion of the California bighorn sheep habitat (41,590 acres) from incompatible uses as an ACEC. The most important of these guidelines provide for preservation of habitat, management of livestock and human use in the habitat, and the exclusion of livestock water developments and new roads which would adversely affect bighorn sheep. Within 8,449 acres of bighorn sheep habitat outside the wilderness, motor vehicle use would be allowed only on designated routes. Habitat of other wildlife species would be given management priority.

Livestock Grazing and Range Management Actions

All presently allotted portions of the Jarbidge River WSA would continue to be allotted for cattle and horse grazing. The approximate amount of livestock use presently occurring within the WSA is:

<u>Allotment</u>	<u>Active Preference</u>
Alzola	173
Simplot	193
Three Creek	212
Poison Creek	1,482
Diamond A	<u>2,777</u>
Total	4,837 AUMs

Under wilderness designation, structural range improvements and land treatments to increase livestock grazing would not occur. New improvements

Proposed Action and Alternatives

would be intended to protect and effectively manage rangeland resources and wilderness values under existing levels of livestock use. Use of motorized vehicles in the construction of new range improvements would not occur. Periodic use of motorized vehicles over established routes for maintenance of pre-FLPMA range improvements and in conjunction with existing livestock operations would continue.

Most plateau areas are vulnerable to wildfires and the resulting replacement of the existing shrub-dominated vegetation by a cheatgrass monoculture. The cheatgrass vegetation would not revert to the present plant community. Reseeding of burned areas, utilizing motorized equipment, would be necessary to prevent dominance of annual non-native species and resulting degradation of natural values. Native species would be used in the reseeding projects within wilderness. Such work would only be done if fully justified and then only with the approval of the BLM Director.

In the next 20 years, cattle use within the Bruneau Canyon portion of the Alzola Allotment would increase by 17 AUMs due to more intensive management.

In the Simplot Allotment, 1,000 acres could be mechanically reseeded with non-native species following wildfire. This would yield about 159 AUMs of additional livestock forage. In addition, a 19 AUM increase in cattle use is expected over the next 20 years based on more intensive management.

Cattle use on the Three Creek and Poison Creek Allotments would increase by an estimated 89 AUMs over the next 20 years based upon the expectation of mechanical reseeding of about 2,400 acres burned by wildfires in the WSA using non-native species. Shallow or stony soils, shadscale range sites, and cultural sites would generally limit the amount of reseeding which could be done within the bighorn sheep ACEC, but some areas could be reseeded to prevent cheatgrass dominance following wildfires.

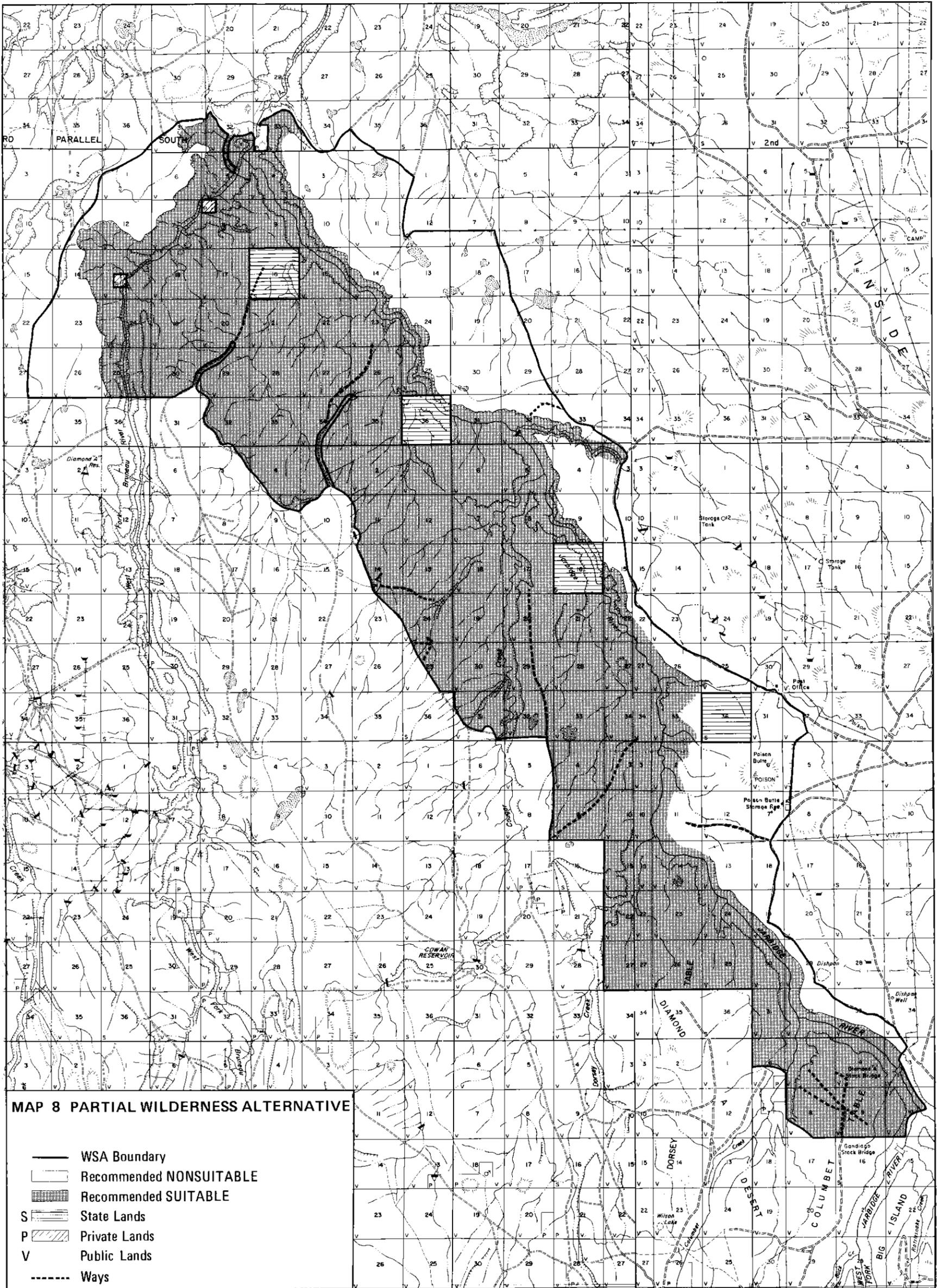
In the Poison Creek Allotment, three miles of new fencing and 0.6 miles of new water pipeline would be constructed to improve cattle distribution and management. An existing 1,800 acre seeding may receive treatment for sagebrush reinvasion.

New structural range improvements and implementation of new AMPs would allow an additional 125 AUMs in the Three Creek and Poison Creek Allotments.

In the Diamond A Allotment, three miles of gap fences would be constructed to prevent cattle use in the Jarbidge River canyon. Fences installed in the canyon bottom would be located and designed so as not to impede whitewater boating. About 5,500 acres could be reseeded to native species following wildfire to prevent degradation of natural values.

Eight existing livestock water impoundments, 3.8 miles of existing fence, and two existing stock bridges would be periodically maintained.

JARBIDGE RIVER WSA ID-17-11



T. 12 S.

T. 13 S.

T. 14 S.

T. 15 S.

T. 16 S.

MAP 8 PARTIAL WILDERNESS ALTERNATIVE

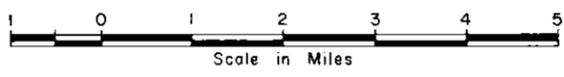
- WSA Boundary
- ⋯ Recommended NONSUITABLE
- ▨ Recommended SUITABLE
- S State Lands
- P Private Lands
- V Public Lands
- - - Ways

R. 6 E.

R. 7 E.

R. 8 E.

R. 9 E.



Mineral Resource Actions

Subject to valid existing rights, the 49,881 acres of the WSA recommended suitable would be withdrawn from all forms of appropriation under the mineral leasing and mining laws. Approximately five acres of the portion recommended suitable are covered by mining claims for Bruneau jasper.

Development of the valid Bruneau jasper claims would continue adjacent to the WSA. All claims would be examined to determine validity. Plans of operations for development of these claims would be processed in accordance with existing regulations. The Bruneau jasper claim area is the only locatable mineral development or claims present within the WSA. No new disturbance is expected on the claim area within the WSA. The present disturbance is less than 1% of the claim area involved.

The WSA has low potential for the discovery or development of economic metallic, other non-metallic, or salable minerals. This is based on the minimal geologic data available and the lack of industry exploration or development. Therefore, no development of such mineral resources is anticipated.

Although the area is classified as prospectively valuable for oil and gas by BLM, the actual potential is considered to be minimal. There are no active oil and gas leases within the WSA, and no activity has ever occurred on previously leased acres in or near the WSA. Development of oil and gas resources is not anticipated because higher potential areas exist elsewhere.

The Indian Hot Springs and Murphy Hot Springs areas are classified as prospectively valuable for geothermal resources by BLM. No further development of these resources is expected due to isolated locations, low temperatures, and small probable reservoir sizes. There are no leases in the area.

Recreation Management Actions

The wilderness, 49,881 acres, would be closed to ORV use. Five miles of road and 12 miles of way would be closed to recreational motor vehicle use. Outside of the wilderness, 16,788 acres would be designated as open to ORV use; and on 8,449 acres, recreation motor vehicle use would be limited to designated roads, ways, and trails.

The wilderness would be available for various primitive recreation opportunities, while wilderness boundary roads and ways and the plateaus outside of the wilderness would be available for semi-primitive recreation activities. Recreation boating use of the Jarbridge and West Fork Bruneau Rivers would be limited to an acceptable level through a permit system.

Future development of recreation facilities outside of the wilderness to satisfy the needs associated with whitewater boating, fishing, and hunting would be a possibility.

Proposed Action and Alternatives

Management Actions to Exchange for State and Private Inholdings

Action would be initiated to acquire two 40-acre private inholdings and three State land sections through voluntary exchanges.

All Wilderness Alternative

All 75,118 acres of the Jarbidge River WSA would be recommended as suitable for wilderness designation (see Map 6). In addition to this acreage of public land, 2,500 acres of state and 80 acres of private lands are included within the all wilderness boundary.

Special Wilderness Features Actions

No vegetation within the WSA would be manipulated to benefit wildlife habitat.

Livestock Grazing and Range Management Actions

All presently allotted portions of the Jarbidge River WSA would continue to be allotted for cattle and horse grazing at current levels. The approximate amount of livestock use present occurring within the WSA is:

<u>Allotment</u>	<u>Active Preference</u>
Alzola	173
Simplot	193
Three Creek	212
Poison Creek	1,482
Diamond A	<u>2,777</u>
Total	4,837 AUMs

Under wilderness designation, structural range improvements and land treatments to increase livestock grazing would not occur. New improvements would be intended to protect and effectively manage rangeland resources under existing levels of livestock use. Motorized vehicles would not be used to construct new structural range improvements since rapid completion is not as critical to long term success and serviceability of structural range improvements as it is to fire rehabilitation seeding. Periodic use of motorized vehicles over established routes for maintenance of pre-FLPMA range improvements and for ongoing livestock management activities would continue.

Most plateau areas are vulnerable to wildfires and the resulting replacement of the existing shrub-dominated vegetation by a cheatgrass monoculture. The cheatgrass vegetation would not revert to the present plant community. Reseeding of burned areas, utilizing motorized equipment, would be necessary to prevent dominance of annual non-native species and the resulting degradation of naturalness in this dry area. About 8,900 acres within the WSA could be reseeded with native species following wildfires. Such work would only be done if fully justified and only with the approval of the BLM Director.

In the Poison Creek Allotment, three miles of new fencing would be constructed to improve cattle distribution and management.

In the Diamond A Allotment, three miles of gap fences would be constructed to prevent cattle use in the Jarbidge River canyon. Fences installed in the canyon bottom would be located and designed so as not to impede whitewater boating.

Eight existing reservoirs, 3.8 miles of existing fence, and two stock bridges would be maintained.

Mineral Resource Actions

Subject to valid existing rights, the 75,118 acres of the WSA recommended suitable would be withdrawn from all forms of appropriation under the mineral leasing and mining laws. Approximately five acres of the portion recommended suitable are covered by mining claims for Bruneau jasper.

Development of the valid Bruneau jasper claims would continue adjacent to the WSA. All claims would be examined to determine validity. Plans of operations for development of these claims would be processed in accordance with existing regulations. The Bruneau jasper claim area is the only locatable mineral development or claims present within the WSA. No new activity is expected on this claim area within the WSA. Present disturbance is less than 1% of the claim area.

Recreation Management Actions

The wilderness, 75,118 acres, would be closed to ORV use. Five miles of road and 14 miles of ways within the wilderness would be closed to recreational motor vehicle use.

The wilderness would be available for various primitive recreation activities, while motorized recreational opportunities would be available along all wilderness boundary roads and ways. Recreational boating use of the Jarbidge and West Fork Bruneau Rivers would be limited to an acceptable level through a permit system.

Future development of recreation facilities outside of the wilderness to satisfy the needs associated with whitewater boating, fishing, and hunting would be a possibility.

Management Actions to Acquire State and Private Inholdings

Action would be initiated to acquire two 40 acre private inholdings and four State land sections through voluntary exchange.

Summary of Impacts

Table 2-2 summarizes the impacts of the various alternatives for the Jarbidge River WSA.

TABLE 2-2

SUMMARY OF IMPACTS
JARBRIDGE RIVER WSA

Environmental Issues	Proposed Action	No		Partial	All
	Partial Wilderness Alternative	Wilderness Alternative	Wild River Alternative	Wilderness Alternative	Wilderness Alternative
Impacts on Wilderness Values Including Special Features	The canyons, 16,740 acres (22% of WSA), designated as wilderness would receive long term Congressional protection. All wilderness values in the portions of the WSA which contain the most spectacular scenery and outstanding opportunities for primitive recreation and solitude would be maintained or enhanced. On the 58,378 acres of plateau not designated as wilderness, there would be long-term losses of naturalness on 13,500 acres (18% of WSA) from seedlings.	With the exception of localized losses to naturalness and solitude occurring on limited sites of mineral exploration work, all wilderness values within the canyons would be retained or enhanced. On the plateaus, long-term losses of naturalness on 13,500 acres (18% of WSA) would occur from seedlings.	All wilderness values on 18,800 acres (25% of WSA) of the WSA that contain the most spectacular scenery and outstanding opportunities for primitive recreation and solitude would receive long term Congressional protection as a wild river. All wilderness values would be maintained or enhanced in the canyons. On the plateaus, long-term loss of naturalness on 13,500 acres (18% of WSA) would occur from seedlings.	All wilderness values on 49,881 acres (66% of WSA) designated as wilderness would receive long term Congressional protection. All wilderness values in the canyons would be maintained or enhanced. On the plateau areas not within the wilderness, long-term losses of naturalness would occur on 5,600 acres (7% of WSA) from seedlings.	All wilderness values would receive long term Congressional protection. All wilderness values would be maintained or enhanced.
Impacts on Range Management Project Maintenance and Construction	There would be no impact on range project maintenance and construction. A 738 AUM (15%) increase in livestock use would occur. Proposed projects include 1.4 miles of pipeline and 6.0 miles of fence.	There would be no impact on range project maintenance and construction. A 738 (15%) increase in livestock use would occur. Proposed projects include 1.4 miles of pipeline and 6.0 miles of fence.	There would be no impact on range project maintenance and construction. A 738 AUM (15%) increase in livestock use would occur. Proposed projects include 1.4 miles of pipeline and 6.0 miles of fence.	On the plateaus west of the Jarbridge River, the cost in terms of time and inconvenience of installing new and maintaining post-FLEPMA (Oct. 21, 1976) projects would approximately double. There would be no impact on the plateaus east of the Jarbridge River. A 409 AUM (8%) increase in livestock use would occur. Proposed projects include 0.6 miles of pipeline and 6.0 miles of fence.	The cost of installing new fences and of maintaining post-FLEPMA (Oct. 21, 1976) projects would approximately double in terms of time and inconvenience. There would be no impacts on the current level of livestock use. Proposed projects include no additional pipeline and 6.0 miles of fence.
Impacts on Mineral Resources	Potential mineral resources on 58,378 acres of plateau would be available for development. Exclusive of the five acres of Bruneau jasper claim, the WSA has low potential for development of mineral resources. Impacts of withdrawal of 16,740 acres from mineral entry and mineral leasing would be insignificant since no development is projected.	With the exception of an existing 80 acre hobby collecting withdrawal, potential mineral resources would be available for development and there would be no impact on development. Exclusive of the five acres of Bruneau jasper claim, the WSA has low potential for development of mineral resources.	Potential mineral resources would be available for development on 56,318 acres. Exclusive of the five acres of Bruneau jasper claim, the WSA has low potential for development of mineral resources. Impacts of withdrawal of 18,800 acres from mineral entry and mineral leasing would be insignificant since no development is projected.	Potential mineral resources would be available for development on 25,237 acres. Exclusive of the five acres of Bruneau jasper claim, the WSA has low potential for development of mineral resources. Impacts of withdrawal of 49,881 acres from mineral entry and mineral leasing would be insignificant since no development is projected.	With the exception of valid existing rights, potential mineral resources would not be available for development. The potential for development of any additional mineral resource is low. Impacts of withdrawal of 75,118 acres from mineral entry and leasing would be insignificant since no development is projected.
Impacts on Recreational Motor Vehicle Use	On the portion of the WSA accessible by motor vehicle, 16,788 acres (22% of WSA) would remain open to ORV use, and on 41,590 acres (56% of WSA), motor vehicle use would be allowed only on designated routes with minimal impact. Closing 16,740 acres (22% of WSA) in the inaccessible canyon would have no impact. Recreational motor vehicle use would increase from the current 200 visitor days to 400 visitor days.	On the portion of the WSA accessible by motor vehicle, 16,788 acres (22% of WSA) would remain open to ORV use, and on 41,590 acres (56% of WSA), motor vehicle use would be allowed only on designated routes with minimal impact. Limiting use on 16,740 acres (22% of WSA) in the inaccessible canyon would have no impact. Recreational motor vehicle use would increase from the current 200 visitor days to 400 visitor days.	On the portion of the WSA accessible by motor vehicle, 16,788 acres (22% of WSA) would remain open to ORV use, and on 41,590 acres (56% of WSA), motor vehicle use would be allowed only on designated routes with minimal impact. Limiting use on 16,740 acres (22% of WSA) in the inaccessible canyon would have no impact. Recreational motor vehicle use would increase from the current 200 visitor days to 400 visitor days.	On the portion of the WSA accessible by motor vehicle, 16,788 acres (22% of WSA) would remain open to ORV use, and on 41,590 acres (56% of WSA) would be designated as limited to designated routes, and 33,141 acres (44% of WSA) would be closed to recreational motor vehicles. Recreational motor vehicle use would increase from the current 200 visitor days to 360 visitor days and 140 visitor days would be foregone annually. The impacts of shifting use would be negligible. Closing 16,740 acres (22% of WSA) in the inaccessible canyon would have no impact.	The entire area would be closed to recreational motor vehicle use. Recreational motor vehicle use would increase from the current 200 visitor days to 300 visitor days. This use would occur along the boundary of the WSA. 100 visitor days would be foregone annually. The impacts of shifting use to adjacent public lands would be negligible.

KING HILL CREEK WSA (ID-19-2)

For the King Hill Creek WSA, cultural resource management actions will be the same for each alternative. Cultural sites found to be eligible would be nominated for inclusion within the National Register of Historic Places.

Proposed Action (No Wilderness Alternative)

All 29,309 acres within the King Hill Creek WSA would be recommended as nonsuitable for wilderness designation (see Map 9).

Special Wilderness Features Actions

No specific projects to benefit wildlife are proposed with the exception of the limitation on the use of snowmobiles addressed under Recreation and changes in livestock use addressed in the following section.

Livestock Grazing and Range Management Actions

Generally, currently allotted portions of the King Hill Creek WSA would continue to be used for cattle and sheep grazing. However, grazing would be excluded from portions of the West Fork King Hill Creek to improve riparian and aquatic habitat. The approximate amount of livestock use occurring in the WSA is:

<u>Allotment</u>	<u>Active Preference</u>
Hammett #1	3,184
Hammett #4	313
Hammett #7	27
King Hill	532
Total	<u>4,056</u> AUMs

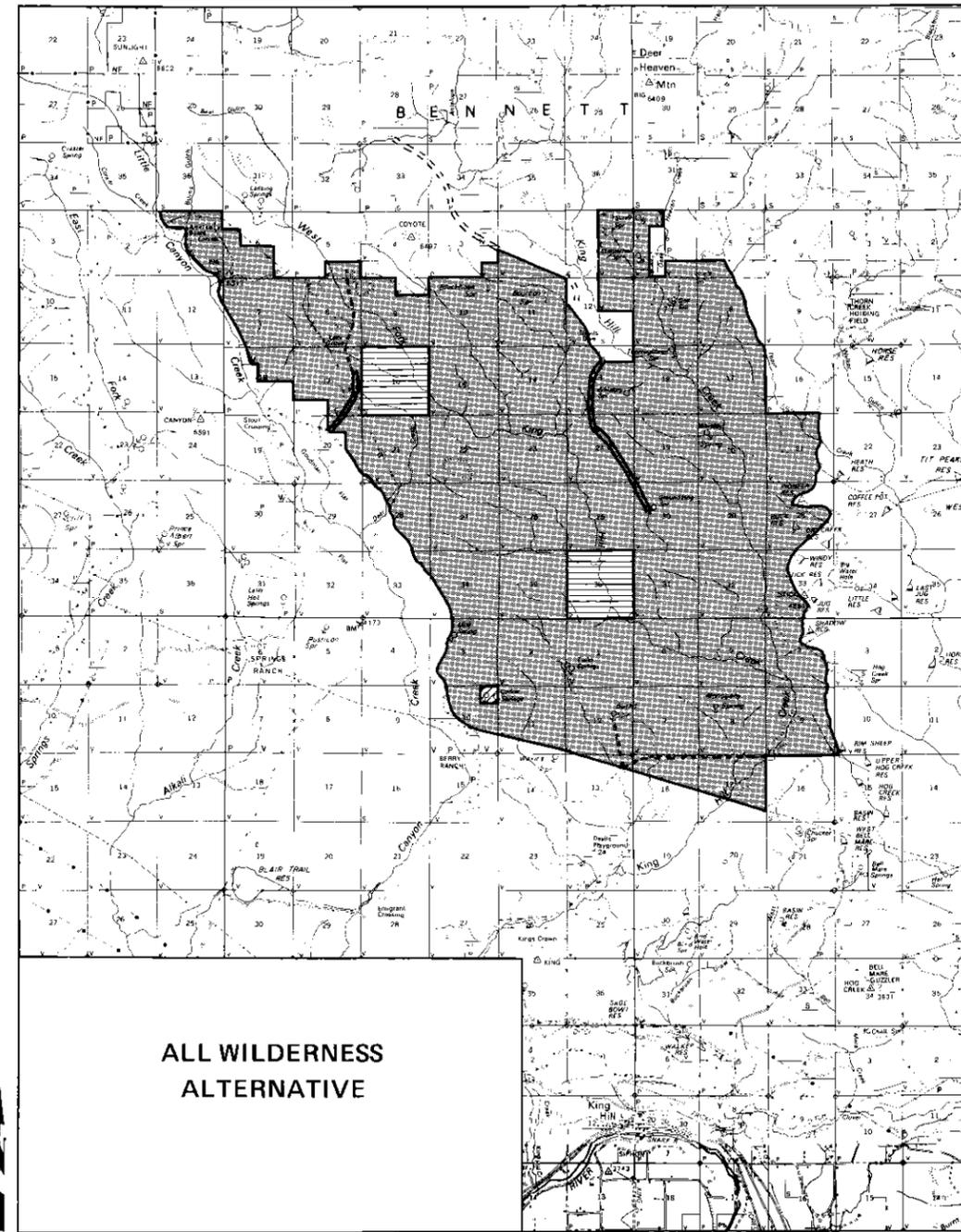
In the Hammett #1 Allotment, two springs would be developed. Two and three-tenth miles of fence would be installed to exclude cattle use along the West Fork King Hill Creek. About 380 acres would be mechanically reseeded with non-native species, adding about 17 AUMs of harvestable livestock forage. About 2,200 acres would be burned to remove sagebrush, providing an additional 50 AUMs of livestock forage.

In the Hammett #4 Allotment, about 630 acres would be mechanically reseeded with non-native species, adding 13 AUMs of harvestable cattle forage. In both the Hammett #1 and #4 Allotments, some spring cattle use would be converted to fall use to reduce possible conflicts with wintering big game.

Livestock use within the portions of the Hammett #7 and King Hill Allotments would remain at current levels.

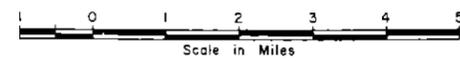
Seven existing spring developments, one existing livestock water impoundment, and 9.9 miles of exiting fence would be periodically maintained. Existing and proposed livestock and range improvements are shown on Map 13.

KING HILL CREEK WSA ID-19-2



**ALL WILDERNESS
ALTERNATIVE**

R. 9 E. R. 10 E. R. 11 E.



MAP 9

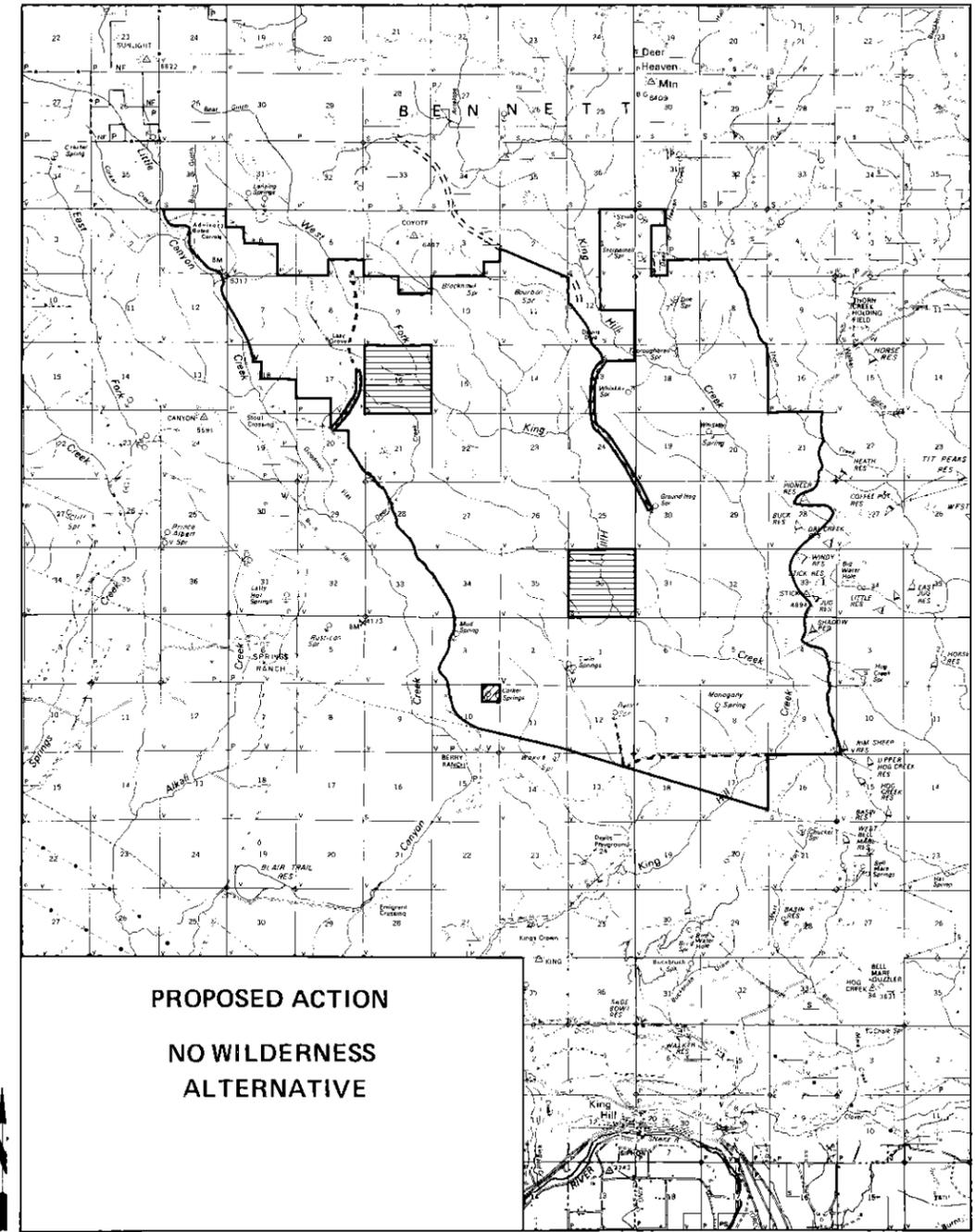
- WSA Boundary
- ▭ Recommended NONSUITABLE
- ▨ Recommended SUITABLE
- T. S. State Lands
- 2 S. P Private Lands
- V Public Lands
- Ways

T. 3 S.

T. 4 S.

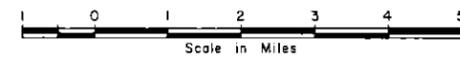
T. 5 S.

KING HILL CREEK WSA ID-19-2



**PROPOSED ACTION
NO WILDERNESS
ALTERNATIVE**

R. 9 E. R. 10 E. R. 11 E.



T. 2 S.

T. 3 S.

T. 4 S.

T. 5 S.

Mineral Resource Actions

There are no mining claims within the WSA and none are known to ever have been filed. The area has low potential for discovery of locatable mineral deposits. This is based on available geologic literature and the lack of industry exploration or development. No mining claim activity is expected to occur.

No salable mineral sites are developed and none are expected to occur due to the isolated location, lack of a market, and lack of usable deposits.

Although the area is classified as prospectively valuable for oil and gas by BLM, the actual potential is considered to be minimal. No active oil and gas leases exist. A nearby 9,678 foot well was dry. Development of oil and gas resources is not anticipated.

The lands are classified as prospectively valuable for geothermal resources by BLM. No development is expected because of the isolated location and low water temperature.

Recreation Management Actions

The entire WSA would be open to ORV and motor vehicle use. Seasonal limitations on the use of snowmobiles to designated routes would occur to prevent harassment of big game on the crucial winter range.

The area would be available for various semi-primitive motorized recreation activities.

The WSA would be included within a larger Special Recreation Management Area, and a recreation management plan would be prepared to guide recreation management and development activities. No recreation development would occur in the WSA.

Partial Wilderness Alternative

26,389 acres of the King Hill Creek WSA would be recommended as suitable for wilderness designation and 2,920 acres would be recommended as nonsuitable for wilderness designation (see Map 10). In addition to the above acres of public land, there are 1,280 acres of state and 40 acres of private lands within the partial wilderness boundary.

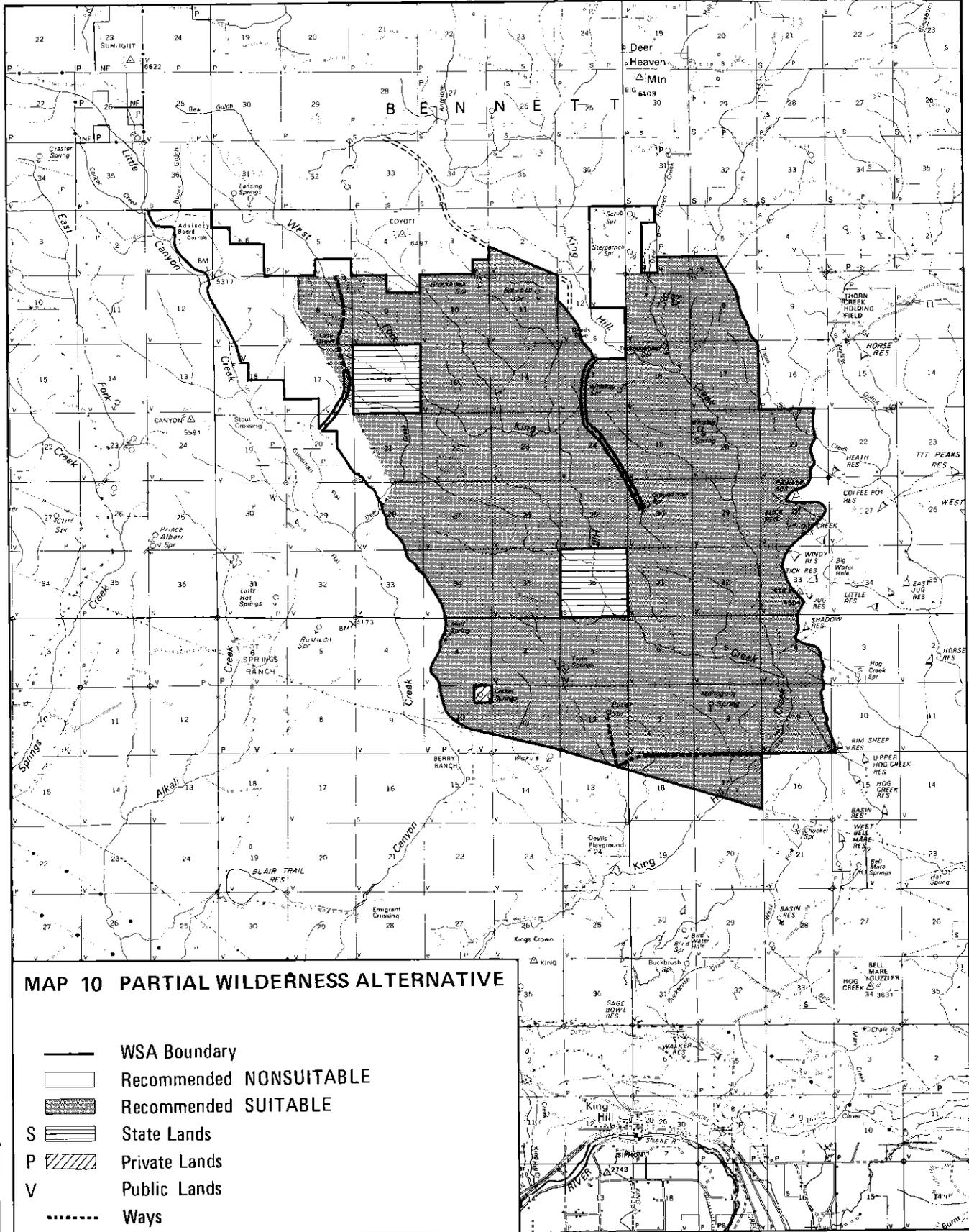
Special Wilderness Features Actions

No specific projects to benefit wildlife are proposed with the exception on the limitation on snowmobile use addressed under Recreation and changes in livestock use addressed in the following section.

Livestock Grazing and Range Management Actions

Generally, currently allotted portions of the King Hill Creek WSA would continue to be used for cattle and sheep grazing. However, grazing would be excluded from portions of the West Fork King Hill Creek to improve riparian

KING HILL CREEK WSA ID-19-2



T. 2 S.

T. 3 S.

T. 4 S.

T. 5 S.

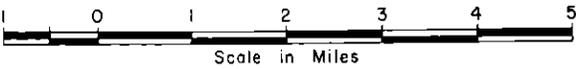
MAP 10 PARTIAL WILDERNESS ALTERNATIVE

-  WSA Boundary
-  Recommended NONSUITABLE
-  Recommended SUITABLE
-  State Lands
-  Private Lands
-  Public Lands
-  Ways

R. 9 E.

R. 10 E.

R. 11 E.



and aquatic habitat. The approximate amount of livestock use occurring in the WSA is:

<u>Allotment</u>	<u>Active Preference</u>
Hammett #1	3,184
Hammett #4	313
Hammett #7	27
King Hill	532
Total	<u>4,056</u> AUMs

Under wilderness designation, new range improvements would be built only if necessary to protect and effectively manage wilderness values and rangeland resources under existing levels of livestock use. Use of motorized vehicles in the construction of new range improvements would not occur. Periodic use of motorized vehicles over established routes for maintenance of pre-FLPMA projects and in conjunction with livestock management would continue.

In the Hammett #1 Allotment, two springs would be developed. Two and three-tenth miles of fence would be installed to exclude cattle use along the West Fork King Hill Creek. Up to 2,200 acres would be burned to remove sagebrush to improve ecological conditions.

In the Hammett #4 Allotment, about 630 acres would be mechanically reseeded with non-native species, adding 13 AUMs of harvestable cattle forage. In both the Hammett #1 and #4 Allotments, some spring cattle use would be converted to fall use to reduce possible conflicts with wintering big game.

Seven existing spring developments, one existing livestock water impoundment, and 9.9 miles of existing fence would be periodically maintained.

Mineral Resource Actions

Subject to valid existing rights, the 26,389 acres of the WSA recommended suitable would be withdrawn from all forms of appropriation under the mineral leasing and mining laws. No existing rights are known to exist.

No mineral resource development activity is anticipated as none has occurred in the past and the geology does not indicate any potential.

Recreation Management Actions

Within the wilderness, 3.5 miles of road, and 4 miles of way would be closed to motor vehicle use by the public. 26,389 acres would be closed to ORV use, and on the 2,920 acres outside of the wilderness, limitations on snowmobile use could occur to prevent harassment of big game on the crucial winter range.

Proposed Action and Alternatives

The wilderness would be available for various primitive recreation activities, while motorized recreation opportunities would be available along all wilderness boundary roads and within the 2,920 WSA acres outside of the wilderness.

Future development of recreation facilities would probably not be needed.

Management Actions to Exchange for State and Private Inholdings

Action would be initiated to acquire one 40-acre private inholding and two State land sections through voluntary exchanges.

All Wilderness Alternative

All 29,309 acres of the King Hill Creek WSA would be recommended as suitable for wilderness designation (see Map 9). In addition to this acreage of public land, there are 1,280 acres of state and 40 acres of private lands within the all wilderness boundary.

Special Wilderness Features Actions

No actions to benefit wildlife are proposed with the exception of changes in livestock use addressed in the following section.

Livestock Grazing and Range Management Actions

Generally, currently allotted portions of the King Hill Creek WSA would continue to be used for cattle and sheep grazing. However, grazing would be excluded from portions of the West Fork King Hill Creek to improve riparian and aquatic habitat. The approximate amount of livestock use occurring in the WSA is:

<u>Allotment</u>	<u>Active Preference</u>
Hammett #1	3,184
Hammett #4	313
Hammett #7	27
King Hill	532
Total	<u>4,056</u> AUMs

Under wilderness designation, new range improvements would be built only if necessary to protect and effectively manage wilderness and rangeland resources under existing levels of livestock use. Periodic use of motorized vehicles over established routes for maintenance of pre-FLPMA projects and for livestock management would continue. Motor vehicles would not be used in the construction of new range improvements.

In the Hammett #1 Allotment, two springs would be developed. Two and three-tenth miles of fence would be installed to exclude cattle use along the West Fork King Hill Creek. Up to 2,200 acres of sagebrush would be burned to improve ecological conditions. In both the Hammett #1 and #4 Allotments, some spring cattle use would be converted to fall use to reduce possible conflicts with wintering big game.

Seven existing spring developments, one existing water impoundment, and 9.9 miles of existing fence would be periodically maintained.

Mineral Resource Actions

Subject to valid existing rights, the 29,309 acres of the WSA recommended suitable would be withdrawn from all forms of appropriation under the mineral leasing and mining laws. No existing rights are known to exist.

No mineral resource development activity is anticipated as none has occurred in the past and the geology does not indicate any potential.

Recreation Management Actions

The wilderness, 29,309 acres, would be closed to ORV use. Four miles of road and four miles of way within the wilderness would be closed to recreational motor vehicle use.

The wilderness would be open for various primitive recreation activities, while motorized recreational opportunities would be available along all wilderness boundary roads.

Future development of recreation facilities would probably not be needed.

Management Actions to Exchange for State and Private Inholdings

Action would be initiated to acquire one 40-acre private inholding and two State land sections through voluntary exchanges.

Summary of Impacts

Table 2-3 summarizes the impacts of the various alternatives for the King Hill Creek WSA.

TABLE 2-3

SUMMARY OF IMPACTS
KING HILL CREEK WSA

Environmental Issues	Proposed Action No Wilderness Alternative	Partial Wilderness Alternative	All Wilderness Alternative
Impacts on Wilderness Values Including Special Features	Long-term losses to naturalness would occur on 1,010 acres (3% of WSA) from seedings. On a four-mile section of the West Fork King Hill Creek, wilderness values would be enhanced.	All wilderness values on 26,389 acres (90% of WSA) would receive long term Congressional protection. All wilderness values would be maintained or enhanced. On the remaining 2,920 acres of the WSA, there would be long-term losses of naturalness on 630 acres (2% of WSA) from seedings.	All wilderness values would receive long term Congressional protection. All wilderness values would be maintained or enhanced.
Impacts on Range Management Project Maintenance and Construction	There would be no impact on range project maintenance and construction. A 80 AUM (2%) increase in livestock use would occur. Proposed projects include 2.3 miles of fence.	A 17 AUM (less than 1%) increase in livestock grazing would occur. The cost of construction and maintaining new projects would approximately double in terms of time and inconvenience. Proposed projects include 2.3 miles of fence.	There would be no impact on the current level of livestock use. The cost of constructing and maintaining new projects would approximately double in terms of time and inconvenience. Proposed projects include 2.3 miles of fence.
Impacts on Development of Mineral Resources	Potential mineral resources would be available for development. The WSA has low potential for development of mineral resources. There would be no impact on mineral resource development.	Potential mineral resources would be available for development on 2,920 acres. The WSA has low potential for development of mineral resources. Impacts of withdrawal of 26,389 acres from mineral entry and mineral leasing would be insignificant since no development is projected.	Potential mineral resources would not be available for development. The WSA has low potential for development of mineral resources. Impacts of withdrawal of 29,309 acres from mineral entry and mineral leasing would be insignificant since no development is projected.
Impacts on Recreational Motor Vehicle Use	With the exception of a limitation on snowmobiles to designated routes, there would be no impact on recreational motor vehicle use. Recreational motor vehicle use would increase from the current 100 visitor days to 200 visitor days.	Recreational motor vehicle use on 26,389 acres (90% of WSA) would be closed. The remaining 2,920 acres (10% of WSA) would be designated as open to ORV use with the exception of a limitation on snowmobiles to designated routes. Recreational motor vehicle use would increase from the current 100 visitor days to 130 visitor days and 70 visitor days would be foregone annually. The impacts of shifting use to adjacent public land would be negligible.	The entire area would be closed to recreational motor vehicle use. Recreational motor vehicle use would increase from the current 100 visitor days to 120 visitor days. The use would occur along the boundary of the WSA. 80 visitor days would be foregone annually. The impacts of shifting use to adjacent public lands would be negligible.

CHAPTER 3

AFFECTED ENVIRONMENT

BRUNEAU RIVER - SHEEP CREEK WSA (1D-111-17)

General Characteristics

The Bruneau River - Sheep Creek WSA is located 90 miles southeast of Boise, Idaho. The area has a long irregular configuration following the Bruneau River, East Fork Bruneau River, and Sheep Creek. The WSA is 37 miles long and varies between 1/2 mile and ten miles in width.

The WSA consists of a plateau sharply dissected by over 85 miles of canyons. The plateau is flat with infrequent low knolls providing the only topographic relief. Vegetative cover on the plateau consists principally of big sagebrush-Sandberg bluegrass sites and shadscale-Indian ricegrass sites, with the latter covering the majority of the acreage. Big sagebrush/Thurber needlegrass sites and winterfat sites are also present. Some areas have burned and are dominated by cheatgrass.

The canyons range in depth from 200 to 1,000 feet. The Bruneau River and its major tributaries have carved narrow, meandering courses through rhyolite rock to produce a canyon system typified by vertical rock walls with thousands of rock spires. In some places, cliffs rise directly from the river. In most places, small talus slopes are nestled between rock walls and the rivers. Above the rhyolite chasms there are often additional talus slopes topped with a mantle of basalt. The basalt forms the topographic features of the surrounding plateau.

The slopes of the canyons are covered with big sagebrush species and bunchgrasses. Along the water courses, lush riparian areas are lined with western juniper and dense growths of rushes, sedges, poison ivy, and grasses.

Cheatgrass, an invading species, has gained an increased presence on the plateau and within the canyons. Cheatgrass is found in nearly pure stands on burned areas. Succession in cheatgrass communities toward climax vegetation is negligible on such arid sites. Considerable acreages of stony soils do not lend themselves to reseeding following fire, and these will be dominated by cheatgrass in the long term.

Land Status

The Bruneau River - Sheep Creek WSA contains 104,406 acres of public land. Inholdings include six State sections totalling 3,840 acres.

Wilderness Values

Naturalness

Twenty-nine miles of ways, eleven miles of fence, nineteen livestock water developments, and two miles of constructed livestock trail are within

Affected Environment

the Bruneau River - Sheep Creek WSA. In addition, one three mile long cherrystem road enters the southwestern portion of the area. There are eight stock reservoirs along the boundary, but just outside of the WSA.

Just outside of the southern end of the WSA, mining for jasper is occurring within the canyon.

These imprints are substantially unnoticeable within the WSA as a whole. Less than four percent of the WSA is affected by the imprints of man.

Ecological condition in the canyon portions of the WSA is good, while the ecological condition on the plateau is poor. Prior to 1986, less than 5 percent of the plateau area had burned and was dominated by non-native cheatgrass. During 1986, several lightning-caused fires burned about 30 percent of the WSA's plateaus. Only about one-half of this burned area has potential for rehabilitation with native species.

Solitude

The WSA provides outstanding opportunities for solitude.

The more than 85 miles of canyons provide excellent topographic and vegetative screening between visitor groups and excellent potential for dispersed recreational use.

The large size of the plateau, the screening potential of low vegetation, the topography's potential to disperse visitor groups, and the good access to much of the WSA boundary would assure that groups could visit plateau areas without a disruption of their sense of solitude.

Solitude is frequently disrupted by low flying military aircraft. A U.S. Air Force bombing range is located just east of the WSA.

Primitive and Unconfined Recreation

The natural features of the Bruneau River - Sheep Creek WSA provide a strong recreational attraction to people interested in backpacking, day hiking, sightseeing, photography, wildlife viewing, hunting, fishing, rockhounding, and whitewater boating.

The Bruneau River is nationally known for its excellent whitewater boating, while the canyons are some of the most spectacular in the Nation. The canyons attract boaters and backpackers who are seeking physical challenge and isolation.

In contrast to the physical challenge of the canyons, the surrounding plateau provides numerous opportunities for primitive and unconfined recreation without the physical demands associated with the canyons.

Opportunities for primitive and unconfined recreation in the Bruneau River - Sheep Creek WSA are outstanding.

Special Wilderness Features

Wildlife

Opportunities are good for viewing a variety of wildlife including state sensitive species such as California bighorn sheep, bobcat, red-band trout and river otter. Other terrestrial species include mountain lion, coyote, pronghorn antelope and mule deer. Golden eagles, red-tailed hawks, prairie falcons, great horned owls and kestrels are the most abundant raptors providing photographic and observation opportunities. Chukar, sage grouse and mourning dove are common game birds in the WSA.

Cultural Resources

There are 163 identified prehistoric cultural resource sites within the WSA, which have been evaluated as significant sites eligible for nomination to the National Register of Historic Places as contributing to the integrity of an extensive site district. These may demonstrate a type of habitation and subsistence procurement activity which has not previously been described in the scientific literature for the Northern Great Basin Culture area.

Recreational Motor Vehicle Resources

Recreational use in the WSA dependent on motor vehicles is estimated to be about 150 visitor days annually. This use, mostly hunters, anglers, and visitors driving to the canyon rim, occurs on the 83,606 acres of plateau within the Bruneau River - Sheep Creek WSA, primarily adjacent to the 78 miles of boundary roads and ways and along or adjacent to three miles of cherrystem road and 29 miles of interior ways. Little use off of existing routes occurs.

Mineral Resources

Except for state inholdings and a temporary 24,000 acre withdrawal of the proposed wild river area, all surface and mineral estates in the WSA are open to mineral entry under federal mining laws.

The Bruneau River - Sheep Creek WSA consists of tertiary volcanic extrusives with intercalated outcrops of lake bed sediments. Minor amounts of fine placer gold washed in from the Jarbidge Mountains are the only metallic locatable minerals known to occur. The small showings of gold are not considered to have any potential for economic development.

The only active mining occurs at Indian Hot Springs for jasper and fire opal. This deposit has been mined for years for Bruneau jasper. White-rind jasper and fire opal have also been produced but not in significant quantities. Fluorescent calcite is also present. There are eight mining claims at the Indian Hot Springs area, all or portions of which totalling about 100 acres are within the WSA.

Affected Environment

Other deposits of hobby collecting minerals such as zeolites, geodes, and jaspers are known to occur within the WSA. None are known to be of an economic value that would support development.

Sand and gravel deposits occur along the river channel. There is no access to these deposits except at Indian Hot Springs. The potential for development is therefore considered poor.

The whole area is considered prospectively valuable for oil and gas by BLM. Actual potential is low. Without seismic work and drill data, the presence of oil or gas in buried tertiary sediments or possibly deep paleozoic sediments is unknown. Interest by industry has been minimal. There are no active oil and gas leases in the WSA, and no activity has occurred on previously leased areas in or near the WSA.

Hot springs occur at the north and south ends of the WSA. Local low temperature development is the only potential use of this resource. The actual potential, based on the locality of the geothermal springs and their low temperature, is considered to be low. North of the WSA, warm water is being used for fish farming.

Livestock Grazing

The plateau areas and portions of the Sheep Creek and East Fork Bruneau River canyons are currently allotted for cattle grazing. The Bruneau River - Sheep Creek WSA includes portions of the Miller Table, Canyon View, Center, Strickland-Hall-Yates, Simplot, Bruneau Hill, Winter Camp (West Saylor Creek), and Three Creek Allotments.

Livestock access to the canyons is limited or nonexistent in most of the main Bruneau River and lower portion of the Sheep Creek canyons. Livestock trail between the Bruneau and Jarbidge Resource Areas each grazing season, crossing at Indian Hot Springs. Some grazing occurs in the East Fork Bruneau canyon below Winter Camp and in upper Sheep Creek canyon and Mary's Creek canyon.

Livestock distribution on the plateau area is limited primarily by distribution of water, especially during the late spring, summer and early fall months. Pit-type reservoirs in small playas, vernal pools, and water pipelines located outside the WSA provide most of the livestock water on plateau areas.

The Bruneau Hill Allotment has not yet been formally separated from the West Saylor Creek Allotment, but the boundaries of the allotment have generally been agreed upon. The Bruneau Hill Allotment provides 4,200 AUMs of forage for a single cattle operator, of which about 749 AUMs have been allocated from lands within the WSA. However, seedings outside the WSA provide most of the forage production in the allotment. Cattle grazing use is made during a season from March 1 to January 15 annually. There are about three miles of pasture division fences within the WSA.

The Winter Camp Allotment is also not yet formally designated. It provides 3,996 AUMs of forage for a single cattle operator, of which about

63 AUMs have been allocated from lands within the WSA. Seedings also provide the bulk of harvestable forage in this allotment. The season of use is from May 1 to January 10 annually. Three-tenths of a mile of fence within the WSA divides the Bruneau Hill and Winter Camp Allotments.

The public lands in the Three Creek Allotment provide 3,739 AUMs of forage for three cattle operations, of which 955 AUMs have been allocated from WSA lands. The allotment will eventually be split three ways, and the WSA will encompass part of the allotments of two of these operators. Their present seasons of use are from November 21 to February 6 and from August 1 to October 31. There are one and six-tenths miles of existing pasture fences and four pit-type reservoirs within the WSA.

The Bruneau River - Sheep Creek WSA includes minor fringes of the Center, Miller Table, and Canyon View Allotments. These allotments provide 8,482 AUMs for six cattle operations almost entirely outside the WSA. Seven-tenths of a mile of existing fence divide these allotments within the WSA.

The Strickland-Hall-Yates Allotment provides 2,669 AUMs of forage for three cattle operations, of which 400 AUMs is allocated from lands within the WSA. Cattle are allowed to graze the allotment the year round. There is one reservoir development within the WSA.

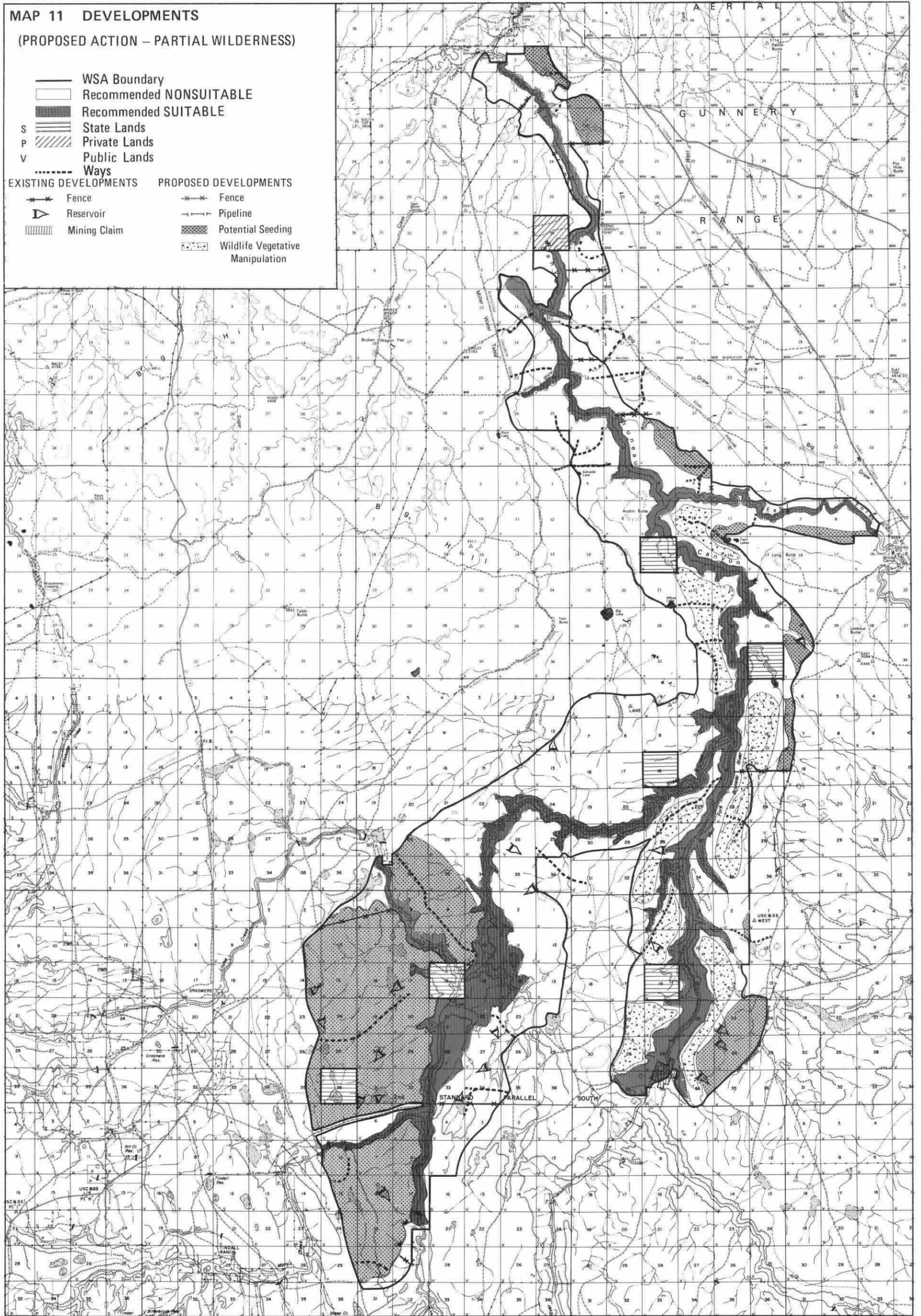
The Simplot Allotment provides 5,057 AUMs of forage for a single cattle operation within three affected pastures, of which 1,815 AUMs are allocated from lands situated within the WSA. Cattle graze the allotment between March 1 and June 15 annually. There are five and three-tenths miles of pasture division fences and 14 reservoirs within the WSA. Four of these are pit-type reservoirs in playas. Populations of Lepidium davisii, a federally listed Category 2 species, are present in the allotment. A deferred-rotation grazing system is planned for lands within the WSA.

BRUNEAU RIVER - SHEEP CREEK WSA ID-111-17

MAP 11 DEVELOPMENTS

(PROPOSED ACTION - PARTIAL WILDERNESS)

- | | | | |
|-----------------------|-------------------------|-----------------------|----------------------------------|
| — | WSA Boundary | | |
| □ | Recommended NONSUITABLE | | |
| ■ | Recommended SUITABLE | | |
| S | State Lands | | |
| P | Private Lands | | |
| V | Public Lands | | |
| --- | Ways | | |
| EXISTING DEVELOPMENTS | | PROPOSED DEVELOPMENTS | |
| —x— | Fence | —x— | Fence |
| ▷ | Reservoir | — — | Pipeline |
| ▨ | Mining Claim | ▨ | Potential Seeding |
| | | ⋯ | Wildlife Vegetative Manipulation |



T. 8 S.

T. 9 S.

T. 10 S.

T. 11 S.

T. 12 S.

T. 13 S.

R. 4 E.

R. 5 E.

R. 6 E.

R. 7 E.

R. 8 E.



JARBIDGE RIVER WSA (ID-17-11)

General Characteristics

The Jarbidge River WSA is located just south of the Bruneau River - Sheep Creek WSA and 120 miles southeast of Boise, Idaho. The area has a linear configuration following the Jarbidge River and short segments of the Bruneau and West Fork Bruneau Rivers. The WSA is 24 miles long and varies between one and 6.5 miles in width.

The WSA consists of a flat to rolling plateau sharply dissected by over 45 miles of canyons. Vegetation consists of predominantly big sagebrush-Sandberg bluegrass sites intermixed with smaller areas of big sagebrush-bluebunch wheatgrass and shadscale sites. Some peripheral acreage of the WSA has been seeded to non-native crested wheatgrass in an attempt to reduce or prevent repetitive wildfires. Other burned areas which were not reseeded are now dominated by near pure stands of cheatgrass, a non-native species. The rate of succession to climax native vegetation following wildfire is nearly nil on such arid sites.

The canyons range in depth from 200 to 1,200 feet. The Jarbidge and West Fork Bruneau Rivers have carved very narrow, meandering courses through rhyolite rock to produce a canyon system typified by vertical rock walls with thousands of rock spires. In many places, rock monoliths rise directly from the river. In other places, small talus slopes are nestled between rock walls and the river or along the canyon rimrock.

The slopes of the canyons are covered with mostly big sagebrush species and bunchgrasses. Along the rivers, lush riparian areas are lined with western juniper and dense growths of rushes, sedges, poison ivy, and grasses. As on the plateau, cheatgrass has invaded into small portions of the canyon, particularly areas accessible by livestock. Livestock use in the canyons has also resulted in invasion of star thistle.

Land Status

The Jarbidge River WSA contains 75,118 acres of public land. Inholdings include four State sections totalling 2,560 acres and two privately-owned 40-acre parcels.

Wilderness Values

Naturalness

Fourteen miles of ways, 3.8 miles of fence, 0.2 miles of water pipeline, eight stock reservoirs, two stock bridges, and 1,800 acres of crested wheatgrass seeding are within the Jarbidge River WSA. In addition, three cherrystem roads totaling five miles enter the northern part of the WSA and one stock reservoir is at the end of a cherrystem road. Two stock reservoirs, a small corral, and two pipelines are along the boundary, but just outside of the WSA.

North of the WSA, jasper mining is occurring between the Bruneau River - Sheep Creek WSA and the Jarbidge River WSA.

Affected Environment

These developments are substantially unnoticeable within the WSA as a whole with less than three percent affected by the imprints of man.

Vegetation in the canyons is in good ecological condition, while vegetation on plateau portions of the WSA is in poor ecological condition. Only about five percent of the plateau areas have burned and are dominated by non-native cheatgrass.

Solitude

Most of the WSA provides outstanding opportunities for solitude.

The more than 45 miles of canyon provide excellent topographic and vegetative screening between visitor groups and excellent potential for dispersed recreational use.

To the west of the Jarbidge River, the large size of the plateau and its rolling nature provide for good topographic screening and for the potential to disperse visitor groups to assure that a sense of solitude would not be lost.

To the east of the Jarbidge River, the northern part of the plateau within the WSA provides outstanding opportunities for solitude, while the southern half lacks outstanding opportunities due to its narrowness and the topographic relief associated with Poison Butte.

Air Force jets frequently pass over the WSA enroute to a bombing range north of the area.

Primitive and Unconfined Recreation

The natural features of the Jarbidge River WSA provide a strong recreational attraction to people interested in various primitive recreation activities. The Jarbidge and West Fork Bruneau Rivers are nationally known for excellent whitewater boating, while the canyons are among the most spectacular in the Nation. The canyons attract recreationists who are seeking physical challenge and isolation.

The plateau provides numerous opportunities for primitive and unconfined recreation without the physical demands associated with the canyons.

Opportunities for primitive and unconfined recreation in the Jarbidge River WSA are outstanding.

Special Wilderness Features

Wildlife

Opportunities are good for viewing a variety of wildlife including state sensitive species such as California bighorn sheep, bobcat, redband trout, and river otter. Other terrestrial species include mountain lion, coyote, pronghorn antelope, and mule deer. Golden eagles, red-tailed hawks, prairie falcons, great horned owls, and

kestrels are the most abundant raptors providing photographic and observation opportunities. Chukar, sage grouse, and mourning dove are common game birds in the WSA.

Cultural Resources

There are 40 identified prehistoric cultural resource sites within the WSA which have been evaluated as significant sites eligible for nomination to the National Register of Historic Places as contributing to the integrity of an extensive site district. These may demonstrate a type of habitation and subsistence procurement activity which has not previously been described in the scientific literature for the Northern Great Basin culture area.

Recreational Motor Vehicle Resources

Recreational use in the WSA dependent on motor vehicles is estimated to be about 200 visitor days annually. This use, mostly hunters and visitors driving to the canyon rim, occurs on the 58,378 acres of plateau within the Jarbidge River WSA, primarily adjacent to the 50 miles of boundary roads and ways and along or adjacent to five miles of cherrystem road and 14 miles of interior ways. Little use off of existing routes occurs.

Mineral Resources

Except for state and private inholdings, an 80 acre hobby collecting withdrawal at Indian Hot Springs, and a temporary 18,800 acre withdrawal of the proposed wild river area, all surface and mineral estates in the WSA are open to mineral entry under federal mining laws.

The Jarbidge River WSA consists of tertiary silicic volcanic extrusives with intercalated outcrops of lake bed sediments. Minor amounts of fine placer gold washed in from the Jarbidge Mountains are the only metallic locatable minerals known to occur. The small showings of gold are not considered to have any potential for economic development.

The only active mining occurs at Indian Hot Springs for jasper and fire opal. This deposit has been mined for years for Bruneau jasper. White-rind jasper and fire opal have also been produced but not in significant quantities. Fluorescent calcite is also present. There are two mining claims at the Indian Hot Springs area, both of which totalling about five acres are partially within the WSA.

No other locatable mineral deposits are known within the WSA.

Sand and gravel deposits occur along the river channel. There is no access to these deposits except at Indian Hot Springs. The potential for development is therefore considered poor.

The whole area is considered prospectively valuable for oil and gas. Actual potential is low. Without seismic work and drill data, the presence of oil or gas in buried tertiary sediments or possibly deep paleozoic sediments is unknown. Interest by industry has been minimal. There are no

Affected Environment

active oil and gas leases in the WSA, and no activity has occurred on previously leased areas in or near the WSA.

Hot springs occur at the north and south ends of the WSA. Local low temperature development is the only potential use of this resource. The actual potential, based on the locality of the geothermal springs and their low temperature, is considered to be low.

Livestock Grazing

The plateau areas and a portion of the West Fork Bruneau River canyon are presently allotted for livestock grazing. The Jarbidge River WSA includes portions of the Simplot, Alzola, Three Creek, Poison Creek, and Diamond A Allotments.

Livestock access to the Jarbidge River canyon is limited, and livestock use has been largely incidental to that on the plateau areas. A portion of the Bruneau Canyon has been used by wintering cattle in conjunction with private lands since the early 1900's. Livestock trail between the Bruneau and Jarbidge Resource Areas and between the Three Creek and Diamond A Allotments each grazing season.

Livestock distribution on the plateau areas is limited primarily by distribution of water, especially during the late spring, summer and early fall months. Pit-type reservoirs in small playas, vernal pools, and water pipelines located outside the WSA provide most of the livestock water on plateau areas.

The public lands in the Three Creek Allotment provide 3,739 AUMs of forage for three cattle operations, of which 212 AUMs have been allocated from WSA lands. The allotment will eventually be split three ways, and the WSA will encompass part of the allotment of one of these operators. The present season of use is from November 21 to February 6. There are one and six-tenths miles of existing allotment fences and two pit-type reservoirs within the WSA.

The Poison Creek Allotment has provided 16,448 AUMs for a single cattle operation. This is a long-term family operation which is now being divided into two operations. A single operation will have all of the preference allocated from the WSA, which totals about 1,482 AUMs. Cattle graze various portions of the Poison Creek Allotment the year round. There are one pit reservoir, 1,800 acres of seeding and one and eight-tenths miles of existing fence within the WSA. Additional fencing and water within the WSA are proposed to reinstate a rotation grazing system following the division of the allotment.

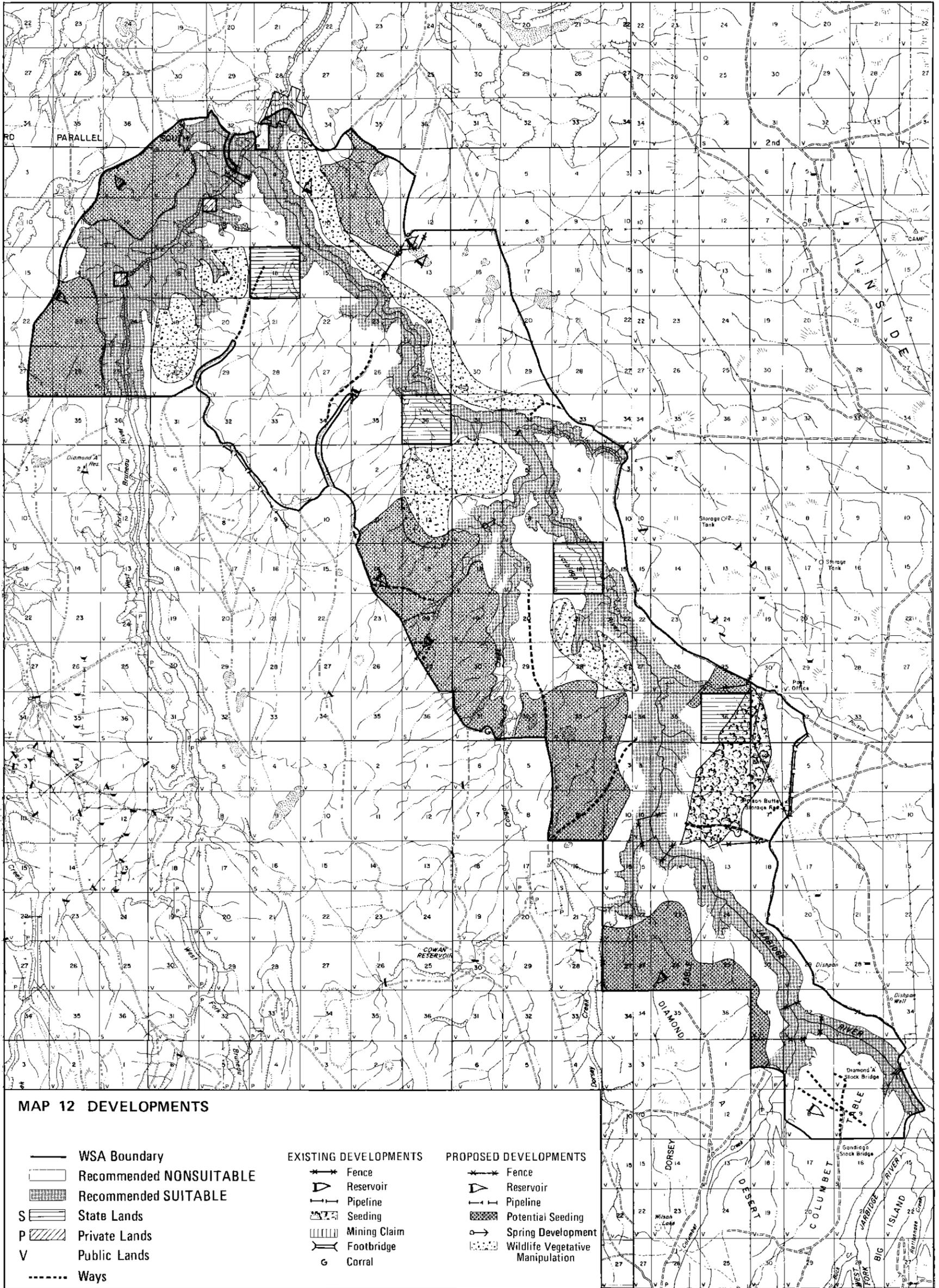
The Diamond A Allotment provides 8,546 AUMs of forage for a horse ranch and a cattle operation. Of this, about 2,777 AUMs are allocated from within the WSA. The majority of the AUMs fall under the management of the Buck Creek Ranch Coordinated Resource Management Plan (CRMP). Most of the livestock use within the WSA is winter cattle grazing, while horses graze the year round. About 3,000 acres of land treatment have been identified by

the CRMP within the WSA. The proposed land treatments would be necessary to initiate a rotation grazing system on the Diamond A Allotment. Within the WSA, there are presently two-tenths miles of water pipeline and three reservoirs. Three miles of proposed riparian enhancement fencing would exclude livestock use from the Jarbidge River Canyon.

The public lands in the affected pasture of the Simplot Allotment provide 3,849 AUMs to a single cattle operation, of which 193 AUMs are allocated from within the WSA. The season of use is from March 1 to May 30 annually. There are two reservoirs within the WSA. Lepidium davisii, a federally listed Category 2 plant species, is known to exist within the Simplot portion of the WSA.

The public lands in the Bruneau Canyon pasture of the Alzola Allotment provide 868 AUMs for a single cattle operation. Of this, about 173 AUMs are allocated from lands within the WSA. Cattle primarily graze bottom lands along the Bruneau River annually during January and February. Four-tenths mile of existing fence confine them to the allotment.

JARBIDGE RIVER WSA ID-17-11



T. 12 S.

T. 13 S.

T. 14 S.

T. 15 S.

T. 16 S.

MAP 12 DEVELOPMENTS

- WSA Boundary
- ▭ Recommended NONSUITABLE
- ▨ Recommended SUITABLE
- S State Lands
- P Private Lands
- V Public Lands
- Ways

EXISTING DEVELOPMENTS

- Fence
- ▭ Reservoir
- Pipeline
- ▨ Seeding
- ▨ Mining Claim
- ▨ Footbridge
- G Corral

PROPOSED DEVELOPMENTS

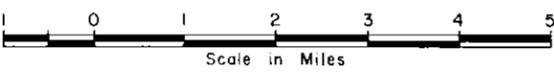
- Fence
- ▭ Reservoir
- Pipeline
- ▨ Potential Seeding
- ▨ Spring Development
- ▨ Wildlife Vegetative Manipulation

R. 6 E.

R. 7 E.

R. 8 E.

R. 9 E.



KING HILL CREEK WSA (ID-19-2)

General Characteristics

The King Hill Creek WSA is located 40 miles east of Boise, Idaho. The area has a trapezoidal configuration and is about eight miles in width from north to south and six to ten miles in width from east to west.

The WSA contains mountainous topography with a maze of drainages, ridges, hills and peaks. The lower elevations of the southern edge of the area are Wyoming big sagebrush, Sandberg bluegrass and cheatgrass sites. The ridges are generally low sagebrush-Sandberg bluegrass sites, and the drainages are big sagebrush-bluebunch wheatgrass sites with a few junipers. The peaks at the northern edge of the area have mountain big sagebrush with bluebunch wheatgrass or Indian fescue depending on slope aspect. Riparian areas contain poison ivy, rushes, sedges, grasses, and willows. Small clumps of Douglas-fir and aspen are present at higher elevations in the northern portion of the WSA. The ground surface is extremely stony, making walking or horseback riding difficult.

Land Status

The King Hill Creek WSA contains 29,309 acres of public land, of which 23,815 acres are in the Boise District and 5,494 acres are in the Shoshone District. Inholdings include two State sections totalling 1,280 acres and one 40-acre private parcel.

Wilderness Values

Naturalness

Four miles of ways, 9.9 miles of fence, seven spring developments, and one livestock reservoir are within the King Hill Creek WSA. In addition, two cherrystem roads totaling four miles protrude into the northern part of the WSA. Several abandoned reservoirs are also in the area. About 80 percent of the WSA is in poor ecological condition, with 10% in fair and 10 percent in good ecological condition. Only a small area is dominated by annual grasses following wildfire.

These developments are substantially unnoticeable within the WSA as a whole with less than one percent of the WSA affected by the imprints of man.

The southern boundary of the WSA is along an electrical transmission line which is visible from within the WSA.

Solitude

The size of the WSA in combination with its very convoluted topography and vegetative screening provide outstanding opportunities for solitude.

Affected Environment

Primitive and Unconfined Recreation

The natural features of the King Hill Creek WSA provide a strong recreational attraction to people interested in backpacking, day hiking, sightseeing, nature photography, wildlife viewing, fishing, and hunting. The size of the WSA, along with its diverse landforms and the good accessibility of its canyons, give visitors a sense of nonconfinement within a scenic area.

Opportunities for primitive and unconfined recreation in the King Hill Creek WSA are outstanding.

Special Wilderness Features

Wildlife

Opportunities are abundant for viewing big game and raptors. The bobcat and the redband trout, both state listed sensitive species, are found in the WSA. Elk and mule deer are relatively abundant, while the black bear and mountain lion are rarely observed. Avian species found include blue grouse, ruffed grouse, great horned owl, chukar, kestrel, goshawk, golden eagle, and red-tailed hawk.

Cultural Resources

No cultural resource sites of National Register quality are known to exist within the WSA. Several significant historic and prehistoric sites have been found within a mile of the WSA boundary. Since much of the WSA is within the projected high cultural resource site density zone, it may be hypothesized that similar sites may be found in the WSA.

Recreational Motor Vehicle Resources

Recreational use in the WSA dependent on motor vehicles, mostly hunting, is estimated to be less than 100 visitor days annually. This use occurs adjacent to the 14 miles of boundary roads and along or adjacent to four miles of cherrystem road and four miles of interior ways. Due to rough and rocky topography, very little use off of existing routes occurs with the exception of winter snowmobile use. The WSA is south of a very popular snowmobile area, and some use may penetrate into the WSA.

Mineral Resources

Except for state and private inholdings, all surface and mineral estates in the WSA are in federal ownership and are open to mineral entry.

The King Hill Creek WSA consists of tertiary volcanic extrusives including basalts and rhyolites. There are no known metallic or other locatable mineral deposits within the WSA. No mining claims or mining districts occur in the WSA.

There are no mineral material sites developed within the WSA, and no deposits with any reasonable potential for development have been found.

The entire WSA is classified as prospectively valuable for oil and gas by BLM, and some leasing has occurred. A nearby well to a depth of 9,678 feet was a dry hole. The potential for the discovery of economic deposits of oil or gas in probable buried tertiary fresh water sediments is considered to be low.

Lands within the WSA are classified as prospectively valuable for geothermal resources by BLM based on the general presence of tertiary volcanic, nearby hot springs, and faults. No geothermal leases exist within the WSA, and the nearby Mountain Home Known Geothermal Resource Area (KGRA) has been declassified. The only potential is for low temperature local geothermal use, and this potential is low.

Livestock Grazing

All of the King Hill WSA is presently allotted for cattle grazing, but the degree of use varies greatly depending upon the amount of surface rock and steepness of slopes. The steep walls of the creek canyons and much of the low sagebrush sites receive light use while small level areas dominated by big sagebrush with fewer surface rocks receive heavy livestock use. The King Hill WSA includes portions of the Hammett #1, Hammett #4, and Hammett #7 Allotments in the Boise BLM District, and the King Hill Allotment in the Shoshone BLM District.

The King Hill WSA, unlike the other two WSAs, receives over 12 inches of precipitation annually. As a result, wildfires are relatively uncommon and do not burn very large areas; and native herbaceous vegetation can maintain its dominance on burned areas. Motorized fire suppression is far more difficult due to surface rock and steep slopes.

Water is provided primarily by dam-type reservoirs, spring developments, and by perennial streams. High cliffs provide significant barriers to cattle use of perennial streams in many places. Water availability also limits cattle distribution, especially in the early fall months.

Much of the area is important winter and spring range for big game. Two of the allotments have more spring than fall cattle use, which may be adjusted to reduce possible spring big game-livestock conflicts.

The Hammett #4 Allotment provides 2,609 AUMs of forage in support of two cattle operations. The allotment is in the process of being divided. About 313 AUMs are allocated from lands within the WSA. Cattle graze the allotment from April 1 to June 30 and from October 1 to November 30 annually. Sixty-one percent of the preference is spring use, and a recent range survey identified the need for a reduction in present livestock use. Most of the lands which could be reseeded are outside of the WSA. There is a developed spring within the WSA.

The Hammett #1 Allotment provides 4,135 AUMs for two cattle operations. About 3,184 AUMs are allocated from within the WSA. A large share of the lands within the WSA are the least productive in the allotment due to surface rock and clay soils. Cattle graze the allotment from April 10 to July 15 in spring and from October 16 to November 15 in fall. About 76% of

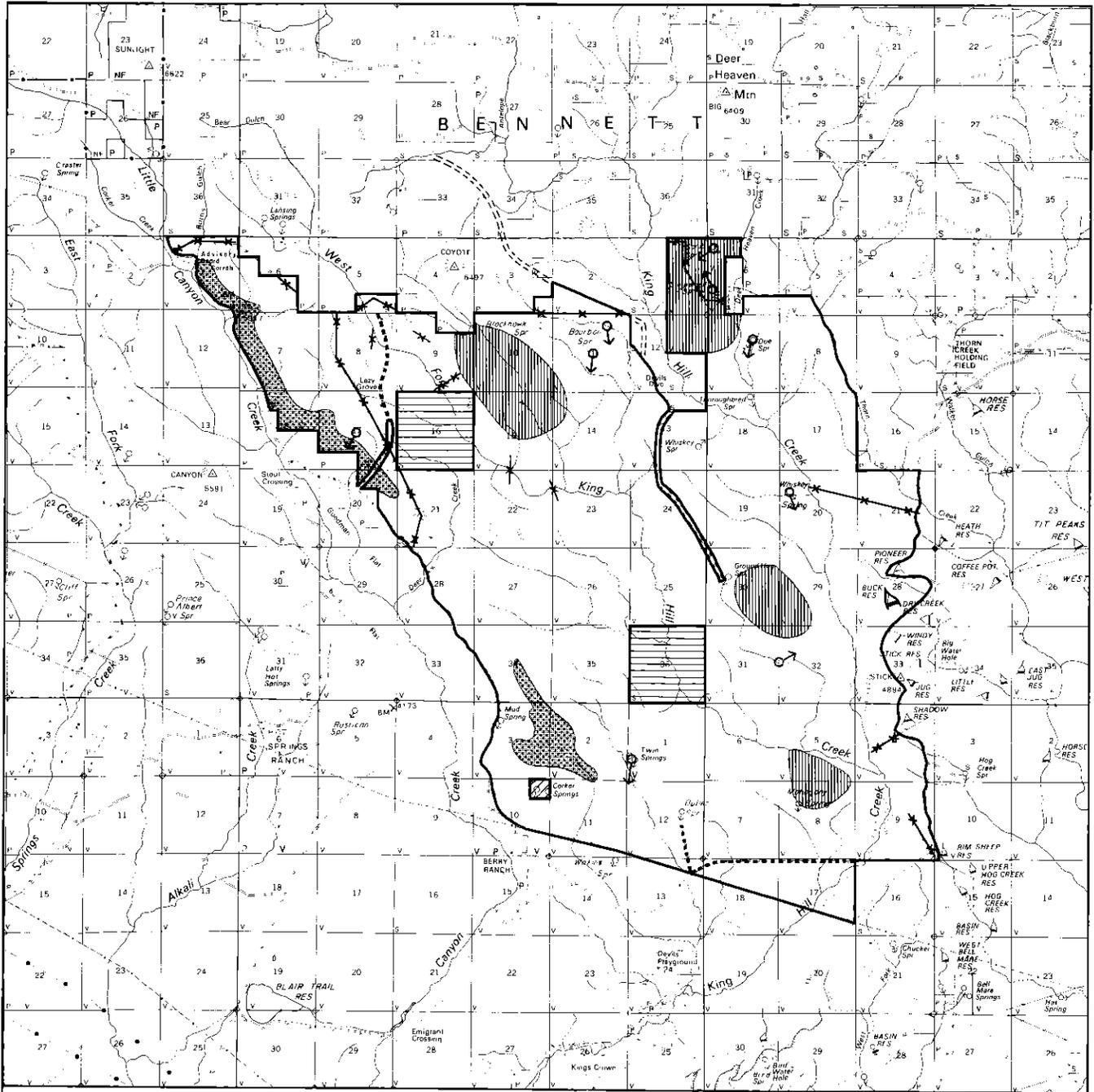
Affected Environment

the preference is spring use, and a recent range survey identified the need for a reduction in present livestock use. Nearly all of the reseeding potential is outside of the WSA. There are three existing spring developments within the WSA.

The Hammett #7 Allotment provides 340 AUMs to three cattle operations and one sheep operation. Private and state lands make up the bulk of the allotment, and grazing use on the public lands is licensed on a custodial basis in conjunction with them. About 27 AUMs are allocated from the public lands within the WSA. Sheep use is made in late spring and fall, while cattle use is primarily in summer and early fall. About six miles of fencing divide the three allotments in the Boise District portion of the WSA.

The King Hill Allotment provides 2,416 AUMs of forage for a single cattle operation. About 532 AUMs have been allocated from lands within the WSA. A large share of the lands within the WSA are the least productive in the allotment due to surface rock and clay soils. Cattle graze the allotment from April 10 to June 30 and from October 16 to November 30 annually. The portion of the allotment within the WSA is under a deferred-rotation grazing system. Three and nine-tenths miles of pasture division fences, one reservoir, and three developed springs are within the WSA.

KING HILL CREEK WSA ID-19-2



T. 2 S.

T. 3 S.

T. 4 S.

T. 5 S.

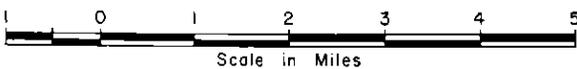
MAP 13 DEVELOPMENTS (PROPOSED ACTION – NO WILDERNESS)

<ul style="list-style-type: none"> WSA Boundary Recommended NONSUITABLE Recommended SUITABLE State Lands Private Lands Public Lands Ways 	<h3>EXISTING DEVELOPMENTS</h3> <ul style="list-style-type: none"> Fence Spring Development Reservoir 	<h3>PROPOSED DEVELOPMENTS</h3> <ul style="list-style-type: none"> Fence Spring Development Potential Seeding Burn
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R. 9 E.

R. 10 E.

R. 11 E.



CHAPTER 4

ENVIRONMENTAL CONSEQUENCES

BRUNEAU RIVER - SHEEP CREEK WSA (ID-111-17)

Proposed Action (Partial Wilderness Alternative)

Under the Proposed Action, the canyons, 20,800 acres, of the Bruneau River - Sheep Creek WSA would be recommended as suitable for wilderness designation. The plateaus of the WSA, 83,606 acres, would be recommended as nonsuitable for wilderness designation.

The primary impacts under this alternative relate to range seeding projects and increases in livestock use and the resulting impacts on wilderness values in the long term.

Impacts on Wilderness Values

Suitable Area

The canyons, 20,800 acres, of the Bruneau River - Sheep Creek WSA would be recommended suitable for wilderness designation. All wilderness values on the area recommended suitable would receive the special legislative protection provided by wilderness designation. The 20,800 acres of canyon contain the WSA's most spectacular scenery and outstanding opportunities for primitive recreation and solitude.

At the southern end of the area recommended as suitable for wilderness designation, the continued removal of Bruneau jasper from existing mining claims determined to be valid in the canyons would cause a localized loss of wilderness values. For the purpose of this analysis, it is estimated that in the long term up to 30 acres of surface disturbance scattered over 100 acres of claims would be associated with this mineral development. The mineral development would result in significant loss of naturalness and outstanding opportunities for primitive recreation and solitude along the canyon segment of a recreationally-important access road to the Bruneau River and along a 3/4 mile section of the Bruneau River. Approximately 0.5% of the suitable area would be impacted.

Fencing to exclude livestock use in the East Fork Bruneau River canyon and the initiation of a deferred-rotation grazing system in accessible parts of Sheep Creek canyon would enhance the wilderness values of naturalness and outstanding opportunities for primitive recreation and solitude within the canyons.

A limitation on the amount of whitewater boating use of the Bruneau River through a permit system would keep the number of boaters who could use the river within a predetermined carrying capacity. The carrying capacity would be based on an analysis of the limits of acceptable change and would restrict use so that wilderness values of naturalness

Environmental Consequences

and solitude would be protected. Boating use is controllable due to the location and number of boater put-in points. The amount of boating use allowed would be the same for all alternatives. Current use is estimated to be well below the yet to be determined carrying capacity.

There would be no impacts to cultural resources in the canyons.

Nonsuitable Area

The wilderness values on the 83,606 acres of plateau recommended nonsuitable within the Bruneau River - Sheep Creek WSA would receive no special legislative protection.

On the plateaus, a 722 AUM increase in livestock use, the installation of 3.5 miles of livestock water pipeline with troughs along the southeastern boundary of the WSA, the installation of up to 4.3 miles of fence for livestock and cultural site management, the drill seeding or interseeding of native and non-native plants on 8,500 acres in seven separate locations to benefit wildlife, and the mechanical reseeding of an estimated 6,900 acres burned by wildfire with non-native species to prevent the invasion of cheatgrass would have long-term adverse impacts on wilderness values. Eighteen percent of the area recommended nonsuitable would be affected. The size and location of fire rehabilitation seedings is dependent upon the location of wildfires, but these seedings could occur in any of the potential seeding areas shown on Map 11, Chapter 3.

Increased livestock use would have localized adverse impacts on solitude and naturalness around existing and proposed livestock water sources. New fences would result in man-made intrusions and an increase in cheatgrass along a narrow strip immediately adjacent to fences, resulting in minor impacts on naturalness. Wildlife and fire rehabilitation seedings would cause a loss of naturalness on 15,400 acres. Seedbeds prepared with rangeland drills or plows would have noticeable furrows for up to ten years and seeded species would have row-like appearance for up to 30 years.

There would be no adverse impacts to cultural resources under this alternative. Small fenced enclosures would benefit seven cultural resource sites by protecting them from livestock trampling.

Wildlife habitat would be enhanced by vegetative manipulation on 8,500 acres of plateau to benefit California bighorn sheep, pronghorn antelope, mule deer and sage grouse. Although habitat for these species would be enhanced and their numbers would be expected to increase, there would be no substantial long-term differences in numbers for these or other wildlife species among the alternatives. Similar long-term wildlife numbers are anticipated because of the relatively small area of vegetative manipulation within the WSA affecting wildlife and because of consistent management actions affecting wildlife species which would occur under the alternatives.

On the plateaus, motor vehicle use would continue on the existing three miles of cherrystem road and 29 miles of way. On the 15,000 acres of plateau within the bighorn sheep habitat, motor vehicle use would only be allowed on designated routes. The remaining 68,606 acres of plateau would be designated as open to ORV use. Sights and sounds from motor vehicle use would have an adverse impact on solitude. The open designation for ORV use would result in the establishment of additional ways which would adversely impact naturalness and solitude. These impacts are expected to remain slight since use of motor vehicles for livestock management would be infrequent and since present recreational use dependent on motor vehicles is about 150 visitor days annually and is expected to remain below 300 visitor days for the next 20 years.

Conclusion. With the exception of the small area impacted by mining for Bruneau jasper, the wilderness values of size, naturalness, and outstanding opportunities for primitive recreation and solitude within the canyons would receive Congressional protection and would not be adversely impacted from actions through implementation of this alternative. Wilderness value of the canyons would be enhanced through better livestock management. On the plateaus, long-term losses to outstanding opportunities for solitude and naturalness would occur because of increased livestock use around water sources, and long-term losses of naturalness would occur on 15,400 acres of range seeding projects.

Impacts on Range Management Project Maintenance and Construction

Maintenance on existing grazing facilities would not change. The Proposed Action would allow construction of new grazing facilities and land treatments. Livestock use would increase 722 AUMs from the current 3,982 to 4,704 over 20 years, an 18% increase.

Conclusion. There would be no impact on grazing facility maintenance. A 722 AUM (18%) increase in livestock use would occur.

Impacts on the Development of Mineral Resources

Subject to valid existing rights, all lands within the 20,800 acres recommended as suitable for wilderness designation would be withdrawn from all forms of mineral entry and mineral leasing. Development of potential mineral resources is considered insignificant as the potential for discovery is low based on the available geologic data and lack of industry activity.

All lands within the 83,606 acres recommended as nonsuitable for wilderness designation would remain open for mineral entry and leasing. All potential mineral resources would be available for development.

The impacts of this alternative on the development of mineral resources would be insignificant because of the low potential for discovery or economic development of metallic, other non-metallic, and salable minerals, and oil, gas, or geothermal resources. It is unlikely that any additional valid discoveries of hobby collecting minerals or valid discoveries of placer gold would be found in the WSA.

Environmental Consequences

Conclusion. The impacts of the withdrawal of 20,800 acres to all forms of mineral entry and mineral leasing would be insignificant due to the low potential for the development of mineral resources.

Impact on Recreational Motor Vehicle Use

The closure of the inaccessible canyons to motor vehicle use would have no impact. No use presently occurs or is expected to occur due to the ruggedness of the canyons. The limitation of motor vehicles to designated roads, ways, and trails on 15,000 acres of plateau would have minimal impact on recreational motor vehicle use because of little use off established routes. The remaining 68,606 acres of plateau would remain open for recreational motor vehicle use over established routes and cross-country with no impact.

Recreational motor vehicle use would remain below 300 visitor days for the next 20 years.

Conclusion. Recreational motor vehicle use would be unaffected under the Proposed Action.

No Wilderness Alternative

Under the No Wilderness Alternative, the entire 104,406 acres of the Bruneau River - Sheep Creek WSA would be recommended nonsuitable for wilderness designation. The canyons of the Bruneau River and Sheep Creek would be designated a Special Recreation Management Area.

The primary impacts under this alternative relate to range seeding projects, increased livestock use, and mineral exploration and the resulting impacts on wilderness values in the long term.

Impacts on Wilderness Values

The entire WSA would be recommended nonsuitable for wilderness designation, and none of the wilderness values on 104,406 acres would receive the special legislative protection provided by wilderness designation.

At the southern end of the canyon portion of the WSA, the continued removal of Bruneau jasper from 100 acres of existing claims would result in significant loss of naturalness and outstanding opportunities for primitive recreation and solitude along the canyon segment of a recreationally-important access road to the Bruneau River and along a 3/4 mile section of the Bruneau River. About 0.1% of the WSA would be impacted. New claim activity is likely to occur for placer gold and rock hound type deposits. Although no valid discoveries are expected, exploration work would result in small areas of ground disturbance and noise which would cause localized losses of naturalness and solitude. The number and location of these possible impacts is not known.

The exclusion of livestock use in the East Fork Bruneau River canyon and the initiation of a deferred-rotation grazing system in accessible parts of

Sheep Creek canyon would enhance the wilderness values of naturalness and outstanding opportunities for primitive recreation and solitude within the canyons.

A limitation on the amount of whitewater boating use of the Bruneau River through a permit system would keep the number of boaters who could use the river within a predetermined carrying capacity. The carrying capacity would be based on an analysis of the limits of acceptable change and would restrict use so that wilderness values of naturalness and solitude would be protected. Boating use is controllable due to the location and number of boater put-in points. The amount of boating use allowed would be the same for all alternatives. Current use is estimated to be well below the yet to be determined carrying capacity.

On the plateaus, a 722 AUM increase in livestock use, the installation of 3.5 miles of livestock water pipeline with troughs along the southeastern boundary of the WSA, the installation of up to 4.3 miles of fence for livestock and cultural site management, the drill seeding or interseeding of native and non-native plants on 8,500 acres in seven separate locations to benefit wildlife, and the mechanical reseeding of an estimated 6,900 acres burned by wildfire with non-native species to prevent the invasion of cheatgrass would have long-term adverse impacts on wilderness values. Fifteen percent of the WSA would be affected. The size and location of fire rehabilitation seedings is dependent upon the location of wildfires, but these seedings could occur in any of the potential seeding areas shown on Map 11, Chapter 3.

Increased livestock use would have localized adverse impacts on solitude and naturalness around existing and proposed livestock water sources. New fences would result in man-made intrusions and an increase in cheatgrass along a narrow strip immediately adjacent to fences, resulting in minor impacts on naturalness. Wildlife and fire rehabilitation seedings would cause a loss of naturalness on 15,400 acres or 15% of the WSA. Seedbeds prepared with rangeland drills or plows would have noticeable furrows for up to ten years and seeded species would have row-like appearance for up to 30 years.

There would be no adverse impacts to cultural resources under this alternative. Small fenced exclosures would benefit seven cultural resource sites by protecting them from livestock trampling.

Wildlife habitat would be enhanced by the vegetative manipulation of 8,500 acres of plateau to benefit California bighorn sheep, pronghorn antelope, mule deer and sage grouse. Although habitat for these species would be enhanced and their numbers would be expected to increase, there would be no substantial long-term differences in numbers for these or other wildlife species among the alternatives. Similar long-term wildlife numbers are anticipated because of the relatively small area of vegetative manipulation within the WSA affecting wildlife and because of consistent management actions affecting wildlife species which would occur under the alternatives.

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Within the canyons, motor vehicle use would be limited to designated routes. This would not impact wilderness values of naturalness and solitude since established routes and the opportunities for the development of new ones in the canyons are negligible. On the plateaus, motor vehicle use would continue on the existing three miles of cherrystem road and 29 miles of way. On the 15,000 acres of plateau within the bighorn sheep habitat, motor vehicle use would only be allowed on designated routes. The remaining 68,606 acres of plateau would be designated as open to ORV use. Sights and sounds from motor vehicle use would have an adverse impact on solitude on the plateaus. The open designation for ORV use would result in the establishment of additional ways which would adversely impact naturalness and solitude. These impacts are expected to remain slight since use of motor vehicles for livestock management would be infrequent and since present recreational use dependent on motor vehicles is about 150 visitor days annually and is expected to remain below 300 visitor days for the next 20 years.

Conclusion. With the exception of the area impacted by mining for Bruneau Jasper and by limited mineral exploration activities that would occur, the wilderness values of size, naturalness, and outstanding opportunities for primitive recreation and solitude within the canyons would not be adversely impacted in the long term. Wilderness value of the canyons would be enhanced through better livestock management. On the plateaus, long-term losses to outstanding opportunities for solitude and naturalness would occur because of increased livestock use around water sources, and long-term losses of naturalness would occur on 15,400 acres of range seeding projects.

Impacts on Range Management Project Maintenance and Construction

Maintenance on existing grazing facilities would not change. The No Wilderness Alternative would allow construction of new grazing facilities and land treatments. Livestock use would increase 722 AUMs from the current 3,982 to 4,704 over 20 years, an 18% increase.

Conclusion. There would be no impact on grazing facility maintenance. A 722 AUM (18%) increase in livestock use would occur.

Impacts on the Development of Mineral Resources

All lands within the 104,406 acre WSA would remain open for mineral entry and leasing. All potential mineral resources would be available for development, and there would be no impact to the development of mineral resources under the No Wilderness Alternative.

Although no valid discoveries are expected, exploration for hobby collecting minerals and placer gold would continue.

Since the probability for discovery of any economic deposits is minimal, the potential for the development of metallic, non-metallic, and salable minerals, and oil, gas, or geothermal resources is low.

Conclusion. Although the potential for economic development is low, mineral resources would be available for development. There would be no

impact on development of mineral resources in the Bruneau River - Sheep Creek WSA.

Impacts on Recreational Motor Vehicle Use

Designation of the canyons and 15,000 acres of plateau as limited to designated roads, ways, and trails would have minimal impact on recreational motor vehicle use since no use occurs in the canyon and little use off of existing routes on the plateau presently occurs or is expected to occur. The remaining 68,606 acres of plateau would remain open for recreational motor vehicle use both over established routes and cross-country with no impact.

Recreational motor vehicle use would remain below 300 visitor days for the next 20 years.

Conclusion. Recreational motor vehicle use would be unaffected under the No Wilderness Alternative.

Wild River Alternative

Under the Wild River Alternative, the entire 104,406 acres of the Bruneau River - Sheep Creek WSA would be recommended nonsuitable for wilderness designation. The major canyons and directly associated plateaus, 24,000 acres, would be included within the National Wild and Scenic Rivers System.

The primary impacts under this alternative relate to range seeding projects and increased livestock use and the resulting impacts on wilderness values in the long term.

Impacts on Wilderness Values

The entire WSA would be recommended nonsuitable for wilderness designation. Wilderness values within 24,000 acres of canyon and directly immediate plateau would receive the special legislative protection provided by wild river designation. The wilderness values within the remaining 80,406 acres of the WSA would receive no special legislative designation.

At the southern end of the portion of the WSA recommended for wild river designation, the continued removal of Bruneau jasper from existing mining claims determined to be valid in the canyons would cause a localized loss of wilderness values. For the purpose of this analysis, it is estimated that in the long term up to 30 acres of surface disturbance scattered over 100 acres of claims would be associated with this mineral development. The mineral development would result in significant loss of naturalness and outstanding opportunities for primitive recreation and solitude along the canyon segment of a recreationally-important access road to the Bruneau River and along a 3/4 mile section of the Bruneau River. About 0.1% of the WSA would be impacted.

The exclusion of livestock use in the East Fork Bruneau River canyon and the initiation of a deferred-rotation grazing system in accessible parts of Sheep Creek canyon would enhance the wilderness values of naturalness and

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outstanding opportunities for primitive recreation and solitude within the canyons.

A limitation on the amount of whitewater boating use of the Bruneau River through a permit system would keep the number of boaters who could use the river within a predetermined carrying capacity. The carrying capacity would be based on an analysis of the limits of acceptable change and would restrict use so that wilderness values of naturalness and solitude would be protected. Boating use is controllable due to the location and number of boater put-in points. The amount of boating use allowed would be the same for all alternatives. Current use is estimated to be well below the yet to be determined carrying capacity.

The wilderness values on the 80,406 acres of plateau within the Bruneau River - Sheep Creek WSA would receive no special legislative protection.

On the plateaus, a 722 AUM increase in livestock use, the installation of 3.5 miles of livestock water pipeline with troughs along the southeastern boundary of the WSA, the installation of up to 4.3 miles of fence for livestock and cultural site management, the drill seeding or interseeding of native and non-native plants on 8,500 acres in seven separate locations to benefit wildlife, and the mechanical reseeding of an estimated 6,900 acres burned by wildfire with non-native species to prevent the invasion of cheatgrass would have long-term adverse impacts on wilderness values. Fifteen percent of the WSA would be affected. The size and location of fire rehabilitation seedings is dependent upon the location of wildfires, but these seedings could occur in any of the potential seeding areas shown on Map 11, Chapter 3.

Increased livestock use would have localized adverse impacts on solitude and naturalness around existing and proposed livestock water sources. New fences would result in man-made intrusions and an increase in cheatgrass along a narrow strip immediately adjacent to fences, resulting in minor impacts on naturalness. Wildlife and fire rehabilitation seedings would cause a loss of naturalness on 15,400 acres. Seedbeds prepared with rangeland drills or plows would have noticeable furrows for up to ten years and seeded species would have row-like appearance for up to 30 years.

There would be no adverse impacts to cultural resources under this alternative. Small fenced enclosures would benefit seven cultural resource sites by protecting them from livestock trampling.

Wildlife habitat would be enhanced by the vegetative manipulation of 8,500 acres of plateau to benefit California bighorn sheep, pronghorn antelope, mule deer and sage grouse. Although habitat for these species would be enhanced and their numbers would be expected to increase, there would be no substantial long-term differences in numbers for these or other wildlife species among the alternatives. Similar long-term wildlife numbers are anticipated because of the relatively small area of vegetative manipulation within the WSA affecting wildlife and because of consistent management actions affecting wildlife species which would occur under the alternatives.

Within the wild river area, motor vehicle use would be limited to designated roads, ways, and trails. This would not impact wilderness values since established routes and the opportunities for the development of new ones in the canyons are negligible. The 13,000 acres of plateau outside the wild river area would also be designated as limited to designated routes, and the remaining 67,406 acres of plateau would be designated as open to ORV use. Sights and sounds from motor vehicle use would have an adverse impact on solitude. The open designation for ORV use would result in the establishment of additional ways which would adversely impact naturalness and solitude. These impacts are expected to remain slight since use of motor vehicles for livestock management would be infrequent and since present recreational use dependent on motor vehicles is about 150 visitor days annually and is expected to remain below 300 visitor days for the next 20 years.

Conclusion. With the exception of the small area impacted by mining for Bruneau Jasper, the wilderness values of size, naturalness, and outstanding opportunities for primitive recreation and solitude within the major canyons and immediate plateau areas would receive Congressional protection as a wild river and would not be adversely impacted. Wilderness value of the canyons would be enhanced through better livestock management. On the plateaus, long-term losses to outstanding opportunities for solitude and naturalness would occur because of increased livestock use around water sources, and long-term losses of naturalness would occur on 15,400 acres of range seeding projects.

Impacts on Range Management Project Maintenance and Construction

Maintenance on existing grazing facilities would not change. The Wild River Alternative would allow construction of new grazing facilities and land treatments. Livestock use would increase 722 AUMs from the current 3,982 to 4,704 over 20 years, an 18% increase.

Conclusion. There would be no impact on grazing facility maintenance. A 722 AUM (18%) increase in livestock use would occur.

Impacts on the Development of Mineral Resources

Subject to valid existing rights, all lands within the 24,000 acres recommended for wild river designation would be withdrawn from all forms of mineral entry and mineral leasing.

The remaining 80,406 acres within the WSA would remain open for mineral entry and leasing. All potential mineral resources would be available for development.

The impacts of this alternative on the development of mineral resources would be insignificant because of low potential for discovery or economic development of metallic, other non-metallic, and salable minerals, and oil, gas, or geothermal resources. It is unlikely that any additional valid discoveries of hobby collecting minerals or valid discoveries of placer gold would be found in the WSA.

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Conclusion. The impacts of the withdrawal of 24,000 acres to all forms of mineral entry and mineral leasing would be insignificant due to the low potential for the development of mineral resources.

Impacts on Recreational Motor Vehicle Use

Within the 24,000 acre wild river area and on 13,000 acres of plateau, motor vehicle use would be allowed only on designated routes. On these 37,000 acres, no to little use presently occurs or is expected to occur off of existing routes. The remaining 67,406 acres of plateau would remain open for recreational motor vehicle use both over established routes and cross-country. There would be negligible impact on recreational motor vehicle use.

Recreation motor vehicle use would remain below 300 visitor days for the next 20 years.

Conclusion. Recreational motor vehicle use would be unaffected under the Wild River Alternative.

All Wilderness Alternative

Under the All Wilderness Alternative, the entire 104,406 acres of Bruneau River - Sheep Creek WSA would be recommended suitable for wilderness designation.

The primary impacts under this alternative relate to the impacts of wilderness designation on opportunities to develop additional forage production to allow increases in livestock grazing and on recreational motor vehicle use.

Impacts on Wilderness Values

Under the All Wilderness Alternative, all 104,406 acres of the Bruneau River - Sheep Creek WSA would be recommended suitable for wilderness designation and all wilderness values would be protected by legislative mandate. Wilderness values of size, naturalness, and outstanding opportunities for solitude and primitive and unconfined recreation would be retained in the WSA.

At the southern end of the WSA, the continued removal of Bruneau jasper from existing mining claim determined to be valid would cause a localized loss of wilderness values in the canyon. For the purpose of this analysis, it is estimated that in the long term up to 30 acres of surface disturbance scattered over 100 acres of claims would be associated with this mineral development. The mineral development would result in significant loss of naturalness and outstanding opportunities for primitive recreation and solitude along the canyon segment of a recreationally-important access road to the Bruneau River and along a 3/4 mile section of the Bruneau River. About 0.1% of the WSA would be impacted.

The exclusion of livestock use in the East Fork Bruneau River canyon and the initiation of a deferred-rotation grazing system in accessible parts of

Sheep Creek canyon would enhance the wilderness values of naturalness and outstanding opportunities for primitive recreation and solitude within the canyons.

A limitation on the amount of whitewater boating use of the Bruneau River through a permit system would keep the number of boaters who could use the river within a predetermined carrying capacity. The carrying capacity would be based on an analysis of the limits of acceptable change and would restrict use so that wilderness values of naturalness and solitude would be protected. Boating use is controllable due to the location and number of boater put-in points. The amount of boating use allowed would be the same for all alternatives. Current use is estimated to be well below the yet to be determined carrying capacity.

The mechanical reseeding of about 6,900 acres burned by wildfire with native plant species would benefit wildlife but would have short-term negative impacts on naturalness and solitude on 7% of the WSA. The use of tractor drawn harrows to prepare seedbeds would cause a disturbed appearance associated with vehicle tracks but would not be very noticeable by the next spring season following the fire. In the long term, such reseeding would maintain naturalness since the invasion of non-native cheatgrass on burned areas would be discouraged.

The installation of up to 4.3 miles of fence for livestock and cultural site management would result in man-made intrusions, resulting in minor impacts on naturalness.

The entire 104,406 acres would be closed to recreational motor vehicle use over existing cherrystem roads and ways and cross-country. Although encounters between motor vehicle users and other recreationists are infrequent, the elimination of recreational motor vehicle use in the WSA would enhance opportunities for solitude. The improvement in the area's naturalness as a result of the closure would be minimal since the existing levels of use is quite low and widely dispersed. The closure to motor vehicle use would slightly enhance naturalness and opportunities for solitude in the canyons by limiting recreation access to canyon rims and resulting human impacts on canyon bottoms. Infrequent motor vehicle use over existing routes to maintain pre-FLPMA livestock improvements and for livestock management functions would have a minimal impact on solitude.

Cultural resource values would benefit by the placement of small fenced enclosures around seven sites to protect them from livestock trampling and by the closure of the entire WSA to recreational motor vehicle use which would limit access to and reduce vandalism of cultural sites.

Conclusion. Within the entire WSA, wilderness values of size, naturalness, and outstanding opportunities for primitive recreation and solitude would receive Congressional protection. Mining for Bruneau jasper would result in a localized loss of wilderness values. Wilderness values of the canyons would be enhanced through better livestock management. On the plateaus, low impact mechanical reseeding of burned areas with native vegetation would result in long-term maintenance of naturalness and would benefit wildlife. Closure of the entire area to

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recreational motor vehicle use would slightly improve naturalness and opportunities for solitude and would benefit cultural values by reducing vandalism.

Impact on Range Management Project Maintenance and Construction

Under the All Wilderness Alternative, additional livestock forage would not be allocated from rehabilitation seedings within the WSA. Livestock use would remain at the current level of 3,982 AUMs.

Motorized equipment would not be used for the construction of new fences or for the maintenance of post-FLPMA (October 21, 1976) projects. Without the use of motorized equipment, construction and maintenance costs in terms of time and inconvenience would approximately double. If practical alternatives are not available, wilderness designation would not affect the use of established routes by motorized vehicle for livestock management functions and for the maintenance of pre-FPLMA projects.

Conclusion. The cost of constructing new fences and of maintaining post-FLPMA projects would approximately double in terms of time and inconvenience. There would be no impact on the current level of livestock use.

Impacts on the Development of Mineral Resources

Subject to valid existing rights, all lands within the 104,406 acre WSA would be withdrawn from all forms of mineral entry and mineral leasing.

The impacts of this alternative on the development of mineral resources would be insignificant because of low potential for discovery or economic development of metallic, other non-metallic, and salable minerals, and oil, gas, or geothermal resources. It is unlikely that any additional valid discoveries of hobby collecting minerals or valid discoveries of placer gold would be found in the WSA.

Conclusion. The impacts of the withdrawal of 104,406 acres to all forms of mineral entry and mineral leasing would be insignificant due to the low potential for the development of mineral resources.

Impacts on Recreational Motor Vehicle Use

The entire 104,406 acre WSA would be closed to recreational motor vehicle use over roads and ways and cross-country. The closure would limit hunting access through the WSA and access to canyon rims by other recreationists. Recreational use dependent on motor vehicles would remain below 200 visitor days/year for the next 20 years and would occur along the 78 miles of boundary roads and ways. Recreational use foregone in the WSA would be absorbed by other public lands.

Conclusion. Recreational motor vehicle use of 100 visitor days would be foregone annually. The impacts of shifting this use to other public lands would be negligible.

JARBIDGE RIVER WSA (ID-17-11)

Proposed Action (Partial Wilderness Alternative)

Under the Proposed Action, the canyons of the Jarbidge River WSA, 16,740 acres, would be recommended as suitable for wilderness designation. The plateau of the WSA, 58,378 acres, would be recommended as nonsuitable for wilderness designation.

The primary impacts under this alternative relate to range seeding projects and increases in livestock use and the resulting impacts on wilderness values in the long term.

Impacts on Wilderness Values

Suitable Area

The canyons, 16,740 acres, of the Jarbidge River WSA would be recommended suitable for wilderness designation. All wilderness values on the area recommended suitable would receive special legislative protection provided by wilderness designation. The 16,740 acres of canyon contain the WSA's most spectacular scenery and outstanding opportunities for primitive recreation and solitude.

Fencing to exclude livestock use in the Jarbidge River canyon would enhance the wilderness values of naturalness and outstanding opportunities for primitive recreation and solitude.

A limitation on the amount of whitewater boating use of the Jarbidge and West Fork Bruneau Rivers through a permit system would keep the number of boaters who could use the rivers within a predetermined carrying capacity. The carrying capacity would be based on an analysis of the limits of acceptable change and would restrict use so that wilderness values of naturalness and solitude would be protected. Boating use is controllable due to the location and number of boater put-in points. The amount of boating use allowed would be the same for all alternatives. Current use is estimated to be well below the yet to be determined carrying capacity.

There would be no impact to cultural resources in the canyons.

Nonsuitable Area

The wilderness values on the 58,378 acres of plateau within the Jarbidge River WSA would receive no special legislative protection.

On the plateaus, a 738 AUM increase in livestock use; the installation of 1.4 miles of livestock water pipelines with troughs; the development and maintenance of 3.5 miles of fence, two reservoirs, and one spring; the drill seeding or interseeding of native and non-native plants on 6,100 acres in four separate locations to benefit wildlife; and the mechanical reseeding with non-native species of about 7,400

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acres burned by wildfire would have long-term adverse impacts on wilderness values. Twenty-three percent of the area recommended nonsuitable would be affected.

Increased livestock use would have localized adverse impacts on solitude and naturalness around existing and proposed livestock water sources. New fences would result in man-made intrusions and an increase in cheatgrass along a narrow strip immediately adjacent to fences, resulting in minor impacts on naturalness. Reservoirs would slightly modify natural landforms, but the impacts on naturalness would be slight since the projects would be visible for only a short distance. Wildlife, fire rehabilitation, and livestock forage production seedings would cause a loss of naturalness on 13,500 acres. Seedbeds prepared with rangeland drills or plows would have noticeable furrows for up to 10 years and seeded species would have row-like appearance for up to 30 years.

There would be no adverse impacts to cultural resources under this alternative. A small fenced enclosure would benefit one cultural resource site by protecting it from livestock trampling.

Wildlife habitat would be enhanced by vegetative manipulation on 6,100 acres of plateau to benefit California bighorn sheep, pronghorn antelope, mule deer and sage grouse. Although habitat for these species would be enhanced and their numbers would be expected to increase, there would be no substantial long-term differences in numbers for these or other wildlife species among the alternatives. Similar long-term wildlife numbers are anticipated because of the relatively small area of vegetative manipulation within the WSA affecting wildlife and because of consistent management actions affecting wildlife species which would occur under the alternatives.

On the plateaus, motor vehicle use would continue on four miles of cherrystem roads and 14 miles of way. ORV use would be designated as open on 16,788 acres of plateau and on 41,590 acres motor vehicle use would be limited to designated routes. Sights and sounds from motor vehicle use would have an adverse impact on solitude. On the 16,788 acres designated as open to ORV travel, use would result in the establishment of additional ways which would adversely impact naturalness and solitude. These impacts are expected to remain slight since use of motor vehicles for livestock management would be infrequent and since present recreational use dependent on motor vehicles is about 200 visitor days annually and is expected to remain below 400 visitor days for the next 20 years.

Conclusion. Wilderness values of size, naturalness, and outstanding opportunities for primitive recreation and solitude within the canyons would receive Congressional protection and would not be adversely impacted from actions under this alternative. Wilderness values within the Jarbidge River canyon would be enhanced through the exclusion of livestock use.

On the plateaus, long-term losses to outstanding opportunities for solitude and naturalness would occur because of increased livestock use around water sources, and long-term losses of naturalness would occur on 13,500 acres of range seeding projects.

Impacts on Range Management Project Maintenance and Construction

Maintenance on existing grazing facilities would not change. The Proposed Action would allow construction of new grazing facilities and land treatments. Livestock use would increase 738 AUMs from the current 4,837 to 5,575 over 20 years, an increase of 15%.

Conclusion. There would be no impact on grazing facility maintenance. A 738 AUM (15%) increase in livestock use would occur.

Impacts on the Development of Mineral Resources

Subject to valid existing rights, all lands within the 16,740 acres recommended as suitable for wilderness designation would be withdrawn from all forms of mineral entry and mineral leasing.

All lands within the 58,378 acres recommended as nonsuitable for wilderness designation would remain open for mineral entry and leasing. All potential mineral resources would be available for development.

The impacts of this alternative on the development of mineral resources would be insignificant because of the low potential for discovery or economic development of metallic, other non-metallic, and salable minerals, and oil, gas, or geothermal resources. It is unlikely that any additional valid discoveries of hobby collecting minerals or valid discoveries of placer gold would be found in the WSA.

Conclusion. The impacts of the withdrawal of 16,740 acres to all forms of mineral entry and mineral leasing would be insignificant due to the low potential for the development of mineral resources.

Impacts on Recreational Motor Vehicle Use

The closure of canyons to motor vehicle use would have no impact on recreation use since no use presently occurs or is expected to occur. The limitation of motor vehicle use to designated routes on 41,590 acres of plateau would have only a minimal impact on recreational motor vehicle use since little use occurs off of established routes. On the remainder of the plateau area, 16,788 acres would remain open for recreational motor vehicle use both over established routes and cross-country.

Recreation motor vehicle use would remain below 400 visitor days for the next 20 years.

Conclusion. In the long term, recreational motor vehicle use would only be slightly impacted by the Proposed Action.

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No Wilderness Alternative

Under the No Wilderness Alternative, the entire 75,118 acres of the Jarbidge River WSA would be recommended nonsuitable for wilderness designation. The canyons of the Jarbidge and West Fork Bruneau Rivers would be designated a Special Recreation Management Area.

The primary impacts under this alternative relate to range seeding projects, increased livestock use, and mineral exploration and the resulting impacts on wilderness values in the long term.

Impacts on Wilderness Values

The entire WSA would be recommended nonsuitable for wilderness designation, and none of the wilderness values on 75,118 acres would receive the special legislation protection provided by wilderness designation.

New mining claim activity may occur for hobby minerals and placer gold. Although no valid discoveries are expected, exploration work could have localized adverse impacts on naturalness and solitude. The number and location of these possible impacts is not known.

Fencing to exclude livestock use in the Jarbidge River canyon would enhance the wilderness values of naturalness and outstanding opportunities for primitive recreation and solitude.

A limitation on the amount of whitewater boating use of the Jarbidge and West Fork Bruneau Rivers through a permit system would keep the number of boaters who could use the rivers within a predetermined carrying capacity. The carrying capacity would be based on an analysis of the limits of acceptable change and would restrict use so that wilderness values of naturalness and solitude would be protected. Boating use is controllable due to the location and number of boater put-in points. The amount of boating use allowed would be the same for all alternatives. Current use is estimated to be well below the yet to be determined carrying capacity.

On the plateaus, a 738 AUM increase in livestock use; the installation of 1.4 miles of livestock water pipelines with troughs; the development and maintenance of 3.5 miles of fence, two reservoirs, and one spring; the drill seeding or interseeding of native and non-native plants on 6,100 acres in four separate locations to benefit wildlife; and the mechanical reseeding with non-native species of about 7,400 acres burned by wildfire would have long-term adverse impacts on wilderness values. About 18% of the WSA would be affected.

Increased livestock use would have localized adverse impacts on solitude and naturalness around existing and proposed livestock water sources. New fences would result in man-made intrusions and an increase in cheatgrass along a narrow strip immediately adjacent to fences, resulting in minor impacts on naturalness. Reservoirs would slightly modify natural landforms, but the impacts on naturalness would be slight since the projects would be visible for only a short distance. Wildlife, fire rehabilitation, and livestock forage production seedings would cause a loss of naturalness on

13,500 acres. Seedbeds prepared with rangeland drills or plows would have noticeable furrows for up to 10 years and seeded species would have row-like appearance for up to 30 years.

There would be no adverse impact to cultural resources under this alternative. A small fenced enclosure would benefit one cultural resource site by protecting it from livestock trampling.

Wildlife habitat would be enhanced by vegetative manipulation on 6,100 acres of plateau to benefit California bighorn sheep, pronghorn antelope, mule deer and sage grouse. Although habitat for these species would be enhanced and their numbers would be expected to increase, there would be no substantial long-term differences in numbers for these or other wildlife species among the alternatives. Similar long-term wildlife numbers are anticipated because of the relatively small area of vegetative manipulation within the WSA affecting wildlife and because of consistent management actions affecting wildlife species which would occur under the alternatives.

On the plateaus, motor vehicle use would continue on four miles of cherrystem roads and 14 miles of way. ORV use would be designated open on 16,788 acres of plateau and on 41,590 acres motor vehicle use would be limited to designated routes. Sights and sounds from motor vehicle use would have an adverse impact on solitude. On the 16,788 acres designated as open to ORV travel, use would result in the establishment of additional ways which would adversely impact naturalness and solitude. These impacts are expected to remain slight since use of motor vehicles for livestock management would be infrequent and since present recreational use dependent on motor vehicles is about 200 visitor days annually and is expected to remain below 400 visitor days for the next 20 years.

Conclusion. With the exception of sites partially impacted by limited mineral exploration activity that could occur, the wilderness values of size, naturalness, and outstanding opportunities for primitive recreation and solitude within the canyons would not be adversely impacted in the long term. Wilderness values within the Jarbridge River canyon would be enhanced through the exclusion of livestock use.

On the plateaus, long-term losses to outstanding opportunities for solitude and naturalness would occur because of increased livestock use around water sources, and long-term losses of naturalness would occur on 13,500 acres of range seeding projects.

Impacts on Range Management Project Maintenance and Construction

Maintenance on existing grazing facilities would not change. The No Wilderness Alternative would allow construction of new grazing facilities and land treatments. Livestock use would increase 738 AUMs from the current 4,837 to 5,575 over 20 years, an increase of 15%.

Conclusion. There would be no impact on grazing facility maintenance and construction. A 738 AUM (15%) increase in livestock use would occur.

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Impacts on the Development of Mineral Resources

With the exception of the existing 80 acre hobby collecting withdrawal, all lands within the 75,118 acre WSA would remain open for mineral entry and leasing. All potential mineral resources would be available for development, and there would be no impact to the development of mineral resources under the No Wilderness Alternative.

Although no valid discoveries are expected, exploration for hobby collecting minerals and placer gold would continue.

Since the probability for discovery of any economic deposits is minimal, the potential for the economic development of metallic, non-metallic, and salable minerals, and oil, gas, or geothermal resources is low.

Conclusion. Although the potential for economic development is low, mineral resources would be available for development. There would be no impact on development of mineral resources in the Jarbidge River WSA.

Impacts on Recreational Motor Vehicle Use

Within the canyons, limitation of motor vehicles to designated routes would have no impact on recreation use since no use presently occurs or is expected to occur off existing roads. The limitation of motor vehicle use to designated routes on 41,590 acres of plateau would have only a minimal impact on recreational motor vehicle use since little use occurs off of established routes. Recreational motor vehicle use on 16,788 acres would remain open on established routes and cross-country areas.

Recreation motor vehicle use would remain below 400 visitor days for the next 20 years.

Conclusion. In the long term, recreational motor vehicle use would only be slightly impacted by the No Wilderness Alternative.

Wild River Alternative

Under the Wild River Alternative, the entire 75,118 acres of the Jarbidge River WSA would be recommended nonsuitable for wilderness designation. The 18,800 acres of the Jarbidge, Bruneau, and West Fork Bruneau River canyons and directly associated plateaus within the WSA would be included within the National Wild and Scenic Rivers System.

The primary impacts under this alternative relate to range seeding projects and increases in livestock use and the resulting impacts on wilderness values in the long term.

Impacts on Wilderness Values

The entire WSA would be recommended nonsuitable for wilderness designation, wilderness values within 18,800 acres of canyon and directly immediate plateau would receive the special legislative protection provided

by wild river designation. The wilderness values within the remaining 56,318 acres of the WSA would receive no special legislative protection.

Fencing to exclude livestock use in the Jarbridge River canyon would enhance the wilderness values of naturalness and outstanding opportunities for primitive recreation and solitude.

A limitation on the amount of whitewater boating use of the Jarbridge and West Fork Bruneau Rivers through a permit system would keep the number of boaters who could use the rivers within a predetermined carrying capacity. The carrying capacity would be based on an analysis of the limits of acceptable change and would restrict use so that wilderness values of naturalness and solitude would be protected. Boating use is controllable due to the location and number of boater put-in points. The amount of boating use allowed would be the same for all alternatives. Current use is estimated to be well below the yet to be determined carrying capacity.

On the plateaus, a 738 AUM increase in livestock use; the installation of 1.4 miles of livestock water pipelines with troughs; the development and maintenance of 3.5 miles of fence, two reservoirs, and one spring; the drill seeding or interseeding of native and non-native plants on 6,100 acres in four separate locations to benefit wildlife; and the mechanical reseeding with non-native species of about 7,400 acres burned by wildfire would have long-term adverse impacts on wilderness values. About 18% of the WSA would be affected.

Increased livestock use would have localized adverse impacts on solitude and naturalness around existing and proposed livestock water sources. New fences would result in man-made intrusions and an increase in cheatgrass along a narrow strip immediately adjacent to fences, resulting in minor impacts on naturalness. Reservoirs would slightly modify natural landforms, but the impacts on naturalness would be slight since the projects would be visible for only a short distance. Wildlife, fire rehabilitation, and livestock forage production seedings would cause a loss of naturalness on 13,500 acres. Seedbeds prepared with rangeland drills or plows would have noticeable furrows for up to 10 years and seeded species would have row-like appearance for up to 30 years.

There would be no adverse impacts to cultural resources under this alternative. A small fenced enclosure to prevent livestock trampling of one site would benefit cultural resources.

Wildlife habitat would be enhanced by vegetative manipulation on 6,100 acres of plateau to benefit California bighorn sheep, pronghorn antelope, mule deer and sage grouse. Although habitat for these species would be enhanced and their numbers would be expected to increase, there would be no substantial long-term differences in numbers for these or other wildlife species among the alternatives. Similar long-term wildlife numbers are anticipated because of the relatively small area of vegetative manipulation within the WSA affecting wildlife and because of consistent management actions affecting wildlife species which would occur under the alternatives.

Environmental Consequences

On the plateaus, motor vehicle use would occur on four miles of cherrystem roads and 14 miles of way. ORV use would be designated as open or 16,788 acres of plateau and on 41,590 acres motor vehicle use would be limited to routes designated for such use. Sights and sounds from motor vehicle use would have an adverse impact on solitude. On the 16,788 acres designated as open to ORV travel, use would result in the establishment of additional ways which would adversely impact naturalness and solitude. These impacts are expected to remain slight since use of motor vehicles for livestock management would be infrequent and since present recreational use dependent on motor vehicles is about 200 visitor days annually and is expected to remain below 400 visitor days for the next 20 years.

Conclusion. Wilderness values of size, naturalness, and outstanding opportunities for primitive recreation and solitude within the canyons would receive Congressional protection as a wild river and would not be adversely impacted. Wilderness values within the Jarbidge River canyon would be enhanced through the exclusion of livestock use.

On the plateaus, long-term losses to outstanding opportunities for solitude and naturalness would occur because of increased livestock use around water sources, and long-term losses of naturalness on 13,500 acres of range seeding projects.

Impacts on Range Management Project Maintenance and Construction

Maintenance on existing grazing facilities would not change. The Wild River Alternative would allow construction of new grazing facilities and land treatments. Livestock use would increase 738 AUMs from the current 4,837 to 5,575 over 20 years, an increase of 15%.

Conclusion. There would be no impact on grazing facility maintenance and construction. A 738 AUM (15%) increase in livestock use would occur.

Impacts on the Development of Mineral Resources

Subject to valid existing rights, all lands within the 18,800 acres recommended for wild river designation would be withdrawn from all forms of mineral entry and mineral leasing.

All lands within the remaining 56,318 acres within the WSA would remain open for mineral entry and leasing. All potential mineral resources would be available for development.

The impacts of this alternative on the development of mineral resources would be insignificant because of the low potential for discovery or economic development of metallic, other non-metallic, and salable minerals, and oil, gas, or geothermal resources. It is unlikely that any additional valid discoveries of hobby collecting minerals or valid discoveries of placer gold would be found in the WSA.

Conclusion. The impacts of the withdrawal of 18,800 acres to all forms of mineral entry and mineral leasing would be insignificant due to the low potential for the development of mineral resources.

Impacts on Recreational Motor Vehicle Use

Within the canyons, the limitation of motor vehicle use would have no impact on recreation use since no use presently occurs or is expected to occur off existing roads. The limitation of motor vehicle use to designated routes on 41,590 acres of plateau would have only a minimal impact on recreational motor vehicle use since little use occurs off of established routes. Recreational motor vehicle use on 16,788 acres of plateau would remain open on established routes and cross-country areas.

Recreation motor vehicle use would remain below 400 visitor days for the next 20 years.

Conclusion. In the long term, recreational motor vehicle use would only be slightly impacted by the Wild River Alternative.

Partial Wilderness Alternative

Under this Partial Wilderness Alternative, the canyons and the plateau west of the Jarbridge River, 49,881 acres, would be recommended as suitable for wilderness designation. The remaining plateaus within the Jarbridge River WSA, 25,237 acres, would be recommended as nonsuitable for wilderness designation.

The primary impacts under this alternative relate to range seeding projects and increases in livestock use and the resulting impacts on wilderness values; and the impacts of plateau wilderness designation on opportunities to develop additional forage production to allow increases in livestock grazing and on recreational motor vehicle use.

Impacts on Wilderness Values

Suitable Area

16,740 acres of canyon and 33,141 acres of plateau within the Jarbridge River WSA would be recommended suitable for wilderness designation. All wilderness values on the 49,881 acres recommended suitable for wilderness designation would receive the special legislation provided by wilderness designation.

The exclusion of livestock use in the Jarbridge River canyon would enhance the wilderness values of naturalness and outstanding opportunities for primitive recreation and solitude.

Cultural resource values would benefit by the placement of a small enclosure around one site to prevent livestock trampling and by the closure of 33,141 acres of plateau to recreational motor vehicle use which would limit access to and reduce vandalism of cultural sites.

Recreational motor vehicle use would be closed on 49,881 acres. Although encounters between motor vehicle users and other recreationists are infrequent, the elimination of recreational motor vehicle use would enhance opportunities for solitude. The improvement in the area's

Environmental Consequences

naturalness as a result of the closure would be minimal since the existing level of use is quite low and widely disbursed.

Within the plateau recommended as suitable for wilderness designation, the mechanical reseeding of 5,500 acres of burned area with native species would benefit wildlife but would have a short term negative impact on naturalness and solitude. Eleven percent of the suitable area would be affected. In the long term, such reseeding would maintain naturalness since the invasion of cheatgrass would be discouraged.

A limitation on the amount of whitewater boating use of the Jarbidge and West Fork Bruneau Rivers through a permit system would keep the number of boaters who could use the rivers within a predetermined carrying capacity. The carrying capacity would be based on an analysis of the limits of acceptable change and would restrict use so that wilderness values of naturalness and solitude would be protected. Boating use is controllable due to the location and number of boater put-in points. The amount of boating use allowed would be the same for all alternatives. Current use is estimated to be well below the yet to be determined carrying capacity.

Nonsuitable Area

On the plateau recommended nonsuitable for wilderness, a 409 AUM increase in livestock use; the installation of 0.6 miles in livestock water pipeline with troughs; the development and maintenance of 3.5 miles of fence, the drill seeding or interseeding of native and non-native plants on 2,200 acres in two separate locations to benefit wildlife; and the mechanical seeding of non-native species of about 3,400 acres burned by wildfire would have long-term adverse impacts on wilderness values. About 22% of the nonsuitable area would be affected.

Increased livestock use would have localized adverse impacts on solitude and naturalness around existing and proposed livestock water sources. New fences would result in man-made intrusions and an increase in cheatgrass along a narrow strip immediately adjacent to fences, resulting in minor impacts on naturalness. Reservoirs would slightly modify natural landforms, but the impacts on naturalness would be slight since the projects would be visible for only a short distance. Wildlife, fire rehabilitation, and livestock forage production seedings would cause a loss of naturalness on 5,600 acres. Seedbeds prepared with rangeland drills or plows would have noticeable furrows for up to 10 years and seeded species would have row-like appearance for up to 30 years.

Wildlife habitat would be enhanced by vegetative manipulation on 2,200 acres of plateau to benefit California bighorn sheep, pronghorn antelope, mule deer and sage grouse. Although habitat for these species would be enhanced and their numbers would be expected to increase, there would be no substantial long-term differences in numbers for these or other wildlife species among the alternatives. Similar long-term wildlife numbers are anticipated because of the relatively small area of

vegetative manipulation within the WSA affecting wildlife and because of consistent management actions affecting wildlife species which would occur under the alternatives.

Recreational motor vehicle use would be limited to designated routes on 8,449 acres, and 16,788 acres would be designated as open to ORV use. Sights and sounds from motor vehicle use would have an adverse impact on solitude. On the area designated as open to ORV travel, use would result in the establishment of additional ways which would adversely impact naturalness and solitude. These impacts are expected to remain slight since use of motor vehicles for livestock management would be infrequent and since present recreational use dependent on motor vehicles is about 200 visitor days annually and is expected not to exceed 360 visitor days for the next 20 years.

Conclusion. Wilderness values of size, naturalness, and outstanding opportunities for primitive recreation and solitude within the canyons and a large portion of plateau would receive Congressional protection and would not be adversely impacted. Wilderness values within the Jarbidge River canyon would be enhanced through the exclusion of livestock use.

On the plateau area recommended nonsuitable for wilderness, long-term losses to outstanding opportunities for solitude and naturalness would occur because of increased livestock use around water sources, and long-term losses of naturalness would occur on 5,600 acres of range seeding projects.

On the plateau recommended suitable for wilderness, low impact mechanical reseeding of burned areas with natural vegetation would result in long-term maintenance of naturalness and would benefit wildlife.

The closure of 33,141 acres of plateau to recreation motor vehicle use would reduce vandalism of cultural sites.

Impacts on Range Management Project Maintenance and Construction

Under this Partial Wilderness Alternative, a 409 AUM increase in livestock use would occur over 20 years from 4,837 to 5,246, an increase of about eight percent.

On the plateau east of the Jarbidge River, the maintenance on existing grazing facilities would not change, and construction of new grazing facilities and land treatments would be allowed.

On the plateau west of the Jarbidge River, development of additional livestock forage through the seeding of non-native species would not occur. New water developments would not be constructed within the wilderness, but could possibly be relocated outside of the wilderness. If practical alternatives are not available, wilderness designation would not affect the use of established routes by motorized vehicle for livestock management functions and for the maintenance of pre-FLPMA projects.

Environmental Consequences

Conclusion. A 409 AUM (8%) increase in livestock use would occur. On the plateaus west of the Jarbidge River, the cost in terms of time and inconvenience of installing new and maintaining post-FLPMA projects would approximately double. There would be no impact on facilities on the plateaus east of the Jarbidge River.

Impacts on the Development of Mineral Resources

Subject to valid existing rights, all lands within the 49,881 acres recommended as suitable for wilderness designation would be withdrawn from all forms of mineral entry and mineral leasing.

All lands within the 25,237 acres recommended as nonsuitable for wilderness designation would remain open for mineral entry and leasing. All potential mineral resources would be available for development.

The impacts of this alternative on the development of mineral resources would be insignificant because of the low potential for discovery or economic development of metallic, other non-metallic, and salable minerals, and oil, gas, or geothermal resources. It is unlikely that any additional valid discoveries of hobby collecting minerals or valid discoveries of placer gold would be found in the WSA.

Conclusion. The impacts of the withdrawal of 49,881 acres to all forms of mineral entry and mineral leasing would be insignificant due to the low potential for the development of mineral resources.

Impacts on Recreational Motor Vehicle Use

The closure of canyons to motor vehicle use would have no impact on recreation use since no use presently occurs or is expected to occur off existing roads. The closure of 33,141 acres of plateau to recreation motor vehicle use would limit access through the area by hunters and other recreationists, but the impacts, in terms of recreation visitor days foregone, would not be significant.

On the plateau east of the Jarbidge River, the limitation of motor vehicle use to designated routes on 8,449 acres would have only a minimal impact on recreational motor vehicle use. Recreational motor vehicle use would remain open on 16,788 acres of plateau on established routes and cross-country areas.

Recreational motor vehicle use would not exceed 360 visitor days for the next 20 years. Recreational use foregone would be absorbed by other public lands.

Conclusion. Recreational motor vehicle use of 40 visitor days would be foregone annually. The impacts of shifting this use to other public lands would be negligible.

All Wilderness Alternative

Under the All Wilderness Alternative, the entire 75,118 acres of the Jarbidge River WSA would be recommended suitable for wilderness designation.

The primary impacts under this alternative relate to the impacts of wilderness designation on opportunities to develop additional forage production to allow increases in livestock grazing and on recreational motor vehicle use.

Impacts on Wilderness Values

Under the All Wilderness Alternative, all 75,118 acres of the Jarbidge River WSA would be recommended suitable for wilderness designation and all wilderness values would be protected by legislative mandate. Wilderness values of size, naturalness, and outstanding opportunities for solitude and primitive and unconfined recreation would be retained in the WSA.

The exclusion of livestock use in the Jarbidge River canyon would enhance the wilderness values of naturalness and outstanding opportunities for primitive recreation and solitude.

A limitation on the amount of whitewater boating use of the Jarbidge and West Fork Bruneau Rivers through a permit system would keep the number of boaters who could use the rivers within a predetermined carrying capacity. The carrying capacity would be based on an analysis of the limits of acceptable change and would restrict use so that wilderness values of naturalness and solitude would be protected. Boating use is controllable due to the location and number of boater put-in points. The amount of boating use allowed would be the same for all alternatives. Current use is estimated to be well below the yet to be determined carrying capacity.

The mechanical reseeding of 8,900 acres of burned areas with native species would benefit wildlife but would have a short-term negative impact on naturalness and solitude. About 12% of the WSA would be affected. The use of tractor drawn harrows to prepare seedbeds would cause vehicle tracks but would not be very noticeable by the next spring season following the fire. In the long term, such reseeding would maintain naturalness since the invasion of non-native cheatgrass would be discouraged. The installation of 3.5 miles of fence for livestock and cultural resource management would result in man-made intrusions, resulting in minor impacts on naturalness.

Cultural resource values would benefit by the installation of a small fenced enclosure around one site to prevent livestock trampling and by the closure of the entire WSA to recreational motor vehicle use which would limit access to and reduce vandalism of cultural sites.

The entire 75,118 acres would be closed to recreational motor vehicle use. Although encounters between motor vehicle users and other recreationists are infrequent, the elimination of recreational motor vehicle use in the WSA would enhance opportunities for solitude. The improvement in the area's naturalness as a result of the closure would be minimal since the existing level of use is quite low and widely dispersed. The closure to

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motor vehicle use would slightly enhance naturalness and opportunities for solitude in the canyons by limiting recreation access to canyon rims and resulting human impacts on canyon bottoms. Infrequent motor vehicle use over existing routes to maintain pre-FLPMA livestock improvements would have minimal impacts on naturalness.

Conclusion. Within the entire WSA, wilderness values of size, naturalness, and outstanding opportunities for primitive recreation and solitude within the canyons would receive Congressional protection and would not be adversely impacted. Wilderness values of the canyons would be enhanced through better livestock management. Low impact mechanical reseeding of burned areas with natural vegetation would result in long term maintenance of naturalness. Closure of the entire area to recreational motor vehicle use would slightly improve naturalness and opportunities for solitude and would reduce cultural site vandalism.

Impacts on Range Management Project Maintenance and Construction

Under the All Wilderness Alternative, development of additional livestock forage through range reseeding with non-native species would not occur. Livestock use would remain at the current level of 4,837 AUMs.

New water developments would not be constructed, and forage utilization would remain uneven within affected pastures.

Motorized equipment would not be used for the construction of new fences or for the maintenance of post-FLPMA projects. Without the use of motorized equipment, costs in terms of time and inconvenience necessary for fencing and maintenance would approximately double.

If practical alternatives are not available, wilderness designation would not affect the use of established routes by motorized vehicle for livestock management functions and for the maintenance of pre-FLPMA projects.

Conclusion. There would be no impact on the current level of livestock use. The cost in terms of time and inconvenience of installing new fences and of maintaining post-FLPMA projects would approximately double.

Impacts on the Development of Mineral Resources

Subject to valid existing rights, all lands within the 75,118 acre WSA would be withdrawn from all forms of mineral entry and mineral leasing.

The impacts of this alternative on the development of mineral resources would be insignificant because of the low potential for discovery or economic development of metallic, other non-metallic, and salable minerals, and oil, gas, or geothermal resources. It is unlikely that any additional valid discoveries of hobby collecting minerals or valid discoveries of placer gold would be found in the WSA.

Conclusion. The impacts of the withdrawal of 75,118 acres to all forms of mineral entry and mineral leasing would be insignificant due to the low potential for the development of mineral resources.

Impacts on Recreational Motor Vehicle Use

The entire 75,118 acre WSA would be closed to recreational motor vehicle use over roads and ways and cross-country. The closure would limit hunting access through the WSA and access to canyon rims by other recreationists. Recreational use dependent on motor vehicles would remain below 300 visitor days/year for the next 20 years and would occur along the 50 miles of boundary roads and ways. Recreational use foregone in the WSA would be absorbed by other public lands.

Conclusion. Recreational motor vehicle use of 100 visitor days would be foregone annually. The impacts of shifting this use to other public lands would be negligible.

KING HILL CREEK WSA (ID-19-2)

Proposed Action (No Wilderness Alternative)

Under the Proposed Action, the entire 29,309 acres of the King Hill Creek WSA would be recommended as nonsuitable for wilderness designation. The WSA would receive administrative designation as a part of a larger Special Recreation Management Area.

The primary impacts under this alternative relate to the impacts of range seeding projects and increased livestock use on wilderness values.

Impacts on Wilderness Values

The entire WSA would be recommended nonsuitable for wilderness designation, and none of the wilderness values on 29,309 acres would receive the special legislative protection provided by wilderness designation.

Fencing to exclude livestock use from a 4-mile section of the West Fork King Hill Creek would enhance the wilderness values of naturalness and outstanding opportunities for primitive recreation and solitude.

An 80 AUM increase in livestock use and the mechanical seeding of 1,010 acres with non-native species would have long-term adverse impacts on wilderness values. About three percent of the WSA would be affected. Increased livestock use would have localized adverse impacts on solitude and naturalness around existing and proposed water sources. Range seeding would cause a loss of naturalness on 1,010 acres. The burning of 2,200 acres to remove brush would have no impact on wilderness values.

The 2.3 miles of new fence would have minor long-term impacts on naturalness. Man-made structures at the two new spring developments would be visible from close-up and would slightly impact naturalness, but the spring enclosures and new troughs would reduce existing livestock trampling at the springs.

Environmental Consequences

With the exception of snowmobiles, the entire WSA would be designated as open to ORV use; however, little use off existing routes is anticipated because of rough and rocky terrain. Snowmobile use would be limited to designated routes. Sights and sounds from motor vehicle use would have an adverse impact on solitude. This impact would remain slight since present recreational use dependent on motor vehicles is about 100 visitor days annually and is expected to remain below 200 visitor days for the next 20 years.

Conclusion. Localized long-term losses to solitude and naturalness would occur because of increased livestock use around water sources, and long-term losses of naturalness would occur on 1,010 acres of range seeding projects. On a section of the West Fork King Hill Creek, naturalness and outstanding opportunities for primitive recreation and solitude would be enhanced through the exclusion of livestock.

Impacts on Range Management Project Maintenance and Construction

There would be no impacts upon maintenance of existing range improvements, upon opportunities to install and maintain additional range improvements, or upon livestock management activities. An 80 AUM increase in livestock use would occur over 20 years from 4,056 to 4,136, an increase of two percent.

Conclusion. There would be no impact on grazing facility maintenance and construction under the Proposed Action (No Wilderness Alternative). Livestock use would increase 80 AUMs (2%).

Impacts on the Development of Mineral Resources

All lands within the 29,309 acre WSA would remain open for mineral entry and leasing. All potential mineral resources would be available for development, and there would be no impact to the development of mineral resources under the No Wilderness Alternative.

No development of mineral resources is expected. The WSA is not considered to have any potential for the discovery of locatable or economic salable mineral deposits. The potential for exploration or discovery of oil and gas is considered minimal.

Conclusion. Although the potential for economic development is low, mineral resources would be available for development. There would be no impact on development of mineral resources in the King Hill Creek WSA.

Impacts on Recreation Motor Vehicle Use

With the exception of snowmobiles, all areas of the WSA accessible by motor vehicles would remain available for recreational motor vehicle use both over roads and ways and cross-country (ORV). In the winter, snowmobile use would be limited to designated routes. Recreational motor vehicle use would remain below 200 visitor days/year for the next 20 years.

Conclusion. With the exception of snowmobile use, recreational motor vehicle use would not be impacted under the Proposed Action.

Partial Wilderness Alternative

Under the Partial Wilderness Alternative, 26,389 acres of the King Hill Creek WSA would be recommended as suitable for wilderness designation, and 2,920 acres would be recommended as nonsuitable for wilderness designation.

The primary impacts under this alternative relate to the impacts of wilderness designation on livestock management and recreational motor vehicle use.

Impacts on Wilderness Values

Suitable Area

Most of the WSA, 26,389 acres, would be recommended as suitable for wilderness designation. All wilderness values on the area recommended suitable would receive the special legislative protection provided by wilderness designation.

The exclusion of livestock use from a 4-mile section of the West Fork King Hill Creek would enhance the wilderness values of naturalness and outstanding opportunities for primitive recreation and solitude.

The burning of 1,200 acres to remove brush would have no impact on wilderness values. The 2.3 miles of new fence and two new spring developments would slightly impact naturalness. The spring exclosures and new troughs would reduce livestock trampling around the two springs.

The closure of 26,389 acres to recreational motor vehicle use would enhance opportunities for solitude and would reduce cultural site vandalism. Improvement in the area's solitude and naturalness as a result of the closure would be minimal due to the low level of existing use and the inaccessibility of the area off existing routes. Infrequent motor vehicle use on existing routes for livestock management purposes would have minimal impact on solitude.

Nonsuitable Area

Within the 2,920 acres recommended as nonsuitable for wilderness designation, the mechanical seeding of 630 acres (22% of the nonsuitable area) with non-native species would have long-term adverse impacts on naturalness. Impacts of 17 AUMs of increased livestock use on solitude and naturalness would be slight. The burning of 1,000 acres to remove brush would have no impact on wilderness values.

During winter, snowmobile use would occur on designated routes resulting in short-term disturbance to solitude. During the remainder of the year, little motor vehicle use would occur so impacts to solitude and naturalness would be slight.

Conclusion. Within 90% of the WSA, wilderness values of size, naturalness, and outstanding opportunities for primitive recreation and solitude would receive Congressional protection and would not be

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adversely impacted. On a section of the West Fork King Creek, the exclusion of livestock would enhance naturalness and outstanding opportunities for primitive recreation and solitude. The closure to recreational motor vehicle use would slightly improve naturalness and opportunities for solitude and would protect cultural sites from vandalism.

On 630 acres within the nonsuitable portion of the WSA, range reseeding would have long-term adverse impacts on naturalness.

Impacts on Range Management Project Maintenance and Construction

Under the Partial Wilderness Alternative, a 17 AUM increase in livestock grazing would occur over 20 years from 4,056 to 4,073, an increase of less than one percent. Within the wilderness, prescribed burning would be used for brush removal.

Motorized equipment would not be used for the construction of new fences, for the development of springs, or for the maintenance of post-FLPMA projects. Without the use of motorized equipment, construction and maintenance costs in terms of time and inconvenience would approximately double.

If practical alternatives are not available, wilderness designation would not affect the use of established routes by motorized vehicles for livestock management functions and for the maintenance of pre-FLPMA projects.

Conclusion. A 17 AUM (less than 1%) increase in livestock grazing would occur. The cost in terms of time and inconvenience of constructing and maintaining new projects would approximately double.

Impacts on the Development of Mineral Resources

All lands within the 26,389 acres recommended as suitable for wilderness designation would be withdrawn from all forms of mineral entry and mineral leasing.

All lands within the 2,920 acres recommended as nonsuitable for wilderness designation would remain open for mineral entry and leasing. All potential mineral resources would be available for development.

The impacts of this alternative on the development of mineral resources would be insignificant because of the low potential for the discovery of economic deposits of locatable or salable mineral deposits, or oil and gas resources.

Conclusion. The impacts of the withdrawal of 26,389 acres to all forms of mineral entry and mineral leasing would be insignificant due to the low potential for the development of mineral resources.

Impacts on Recreational Motor Vehicle Use

Most of the WSA, 26,389 acres, would be closed to recreational motor vehicles including travel over 3.5 miles of road and 4 miles of way. Due to

the rough and rocky topography, little use off established motor vehicle routes occurs in the WSA. The remaining 2,920 acres would be designated as open to ORV use except for the limitation of snowmobiles to designated routes. Recreation use dependent on motor vehicles would remain below 130 visitor days/year for the next 20 years and would mostly occur along the 14 miles of boundary roads. Recreational use foregone in the WSA would be absorbed by other nearby public lands.

Conclusion. Recreational motor vehicle use of 70 visitor days would be foregone annually. The impacts of shifting this use to other public lands would be negligible.

All Wilderness Alternative

Under the All Wilderness Alternative, the entire 29,309 acres of the King Hill Creek WSA would be recommended suitable for wilderness designation.

The primary impacts under this alternative relate to the impacts of wilderness designation on livestock management and recreational motor vehicle use.

Impacts on Wilderness Values

Under the All Wilderness Alternative, all 29,309 acres of the King Hill Creek WSA would be recommended suitable for wilderness designation and all wilderness values would be protected by legislative mandate. Wilderness values of size, naturalness, and outstanding opportunities for solitude and primitive and unconfined recreation would be retained in the WSA.

Fencing to exclude livestock use from a 4-mile section of the West Fork King Hill Creek would enhance the wilderness values of naturalness and outstanding opportunities for primitive recreation and solitude.

The 2.3 miles of new fence and two new spring developments would slightly impact naturalness. The spring exclosures and new troughs would reduce livestock trampling around springs.

The burning of 2,200 acres to reduce brush would have no impact on wilderness values.

The entire 29,309 acres would be closed to recreational motor vehicle use. Although encounters between motor vehicle users and other recreationists are infrequent, the elimination of recreation motor vehicle use from the WSA would enhance opportunities for solitude and would discourage vandalism of cultural sites. Improvement in the area's naturalness as a result of the closure would be minimal due to the low level of existing use and the inaccessibility of the area off existing routes. Infrequent motor vehicle use on existing routes for livestock management purposes would have minimal impact on solitude.

Conclusion. Within the entire WSA, wilderness values of size, naturalness, and outstanding opportunities for primitive recreation and solitude would receive Congressional protection. On a section of the

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West Fork King Hill Creek, the exclusion of livestock would enhance naturalness and outstanding opportunities for primitive recreation and solitude. The closure of recreational motor vehicle use would slightly improve naturalness and opportunities for solitude and would protect cultural sites.

Impacts on Range Management Project Maintenance and Construction

Under the All Wilderness Alternative, livestock use would remain at the current level of 4,056 AUMs. Prescribed burning would be used for brush removal.

Motorized equipment would not be used for the construction of new fences, for the development of springs, or for the maintenance of post-FLPMA projects. Without the use of motorized equipment, construction and maintenance costs would approximately double in terms of time and inconvenience.

If practical alternatives are not available, wilderness designation would not affect the use of established routes by motorized vehicles for livestock management functions and for the maintenance of pre-FLPMA projects.

Conclusion. There would be no impact on the current level of livestock use. The cost in terms of time and inconvenience of constructing and maintaining new projects would approximately double.

Impacts on the Development of Mineral Resources

The entire 29,309 acre WSA would be withdrawn from all forms of mineral entry and mineral leasing.

The impacts of this alternative on the development of mineral resources would be insignificant because of the low potential for the discovery of economic deposits of locatable or salable mineral deposits, or oil and gas resources.

Conclusion. The impacts of the withdrawal of 29,309 acres to all forms of mineral entry and mineral leasing would be insignificant due to the low potential for the development of mineral resources.

Impacts on Recreational Motor Vehicle Use

The entire WSA, 29,309 acres, would be closed to recreational motor vehicles including travel over four miles of road and four miles of way. Due to the rough and rocky topography, little use off established motor vehicle routes occurs in the WSA. Recreation use dependent on motor vehicles would remain below 120 visitor days/year for the next 20 years and would occur along the 14 miles of boundary roads. Recreational use foregone in the WSA would be absorbed by other nearby public lands.

Conclusion. Recreational motor vehicle use of 80 visitor days would be foregone annually. The impacts of shifting this use to other public lands would be negligible.

RELATIONSHIP BETWEEN SHORT-TERM USE OF THE ENVIRONMENT AND THE MAINTENANCE AND ENHANCEMENT OF LONG-TERM PRODUCTIVITY

If a WSA is not designated wilderness, all present, short-term uses would continue. Motor vehicle use, mineral activities, and livestock grazing and range management actions could reduce the wilderness values over the long term.

If an area is designated wilderness, it would ensure the maintenance of present wilderness values. Motorized vehicles could no longer be used except where prescribed by an area's wilderness management plan. Mineral resources would not be available for location and development.

The allocation of resources resulting from this wilderness decision is not expected to have a significant impact on long-term productivity. A wilderness decision would not significantly affect the land's capability to produce renewable resources on a sustained yield basis.

IRREVERSIBLE AND IRRETRIEVABLE COMMITMENT OF RESOURCES

In areas not designated wilderness, commodity production activities could create an irreversible commitment of the wilderness resources in portions of the WSAs. Wilderness designation would not create an irretrievable or irreversible commitment of resources within a WSA. Designation would restrict or stop development activities and maintain an area's natural condition. If, in the future, Congress decides it would be in the national interest to develop certain resources within a wilderness, they can modify the law designating wilderness to allow resource commodity development.

CHAPTER 5

CONSULTATION, COORDINATION, AND PUBLIC PARTICIPATION

Jarbidge Resource Management Plan/Environmental Impact Statement

The Jarbidge Resource Management Plan/Environmental Impact Statement (RMP/EIS) was prepared by an interdisciplinary team with expertise in range management, wildlife, recreation, lands, wilderness, economics, soils, watershed, cultural resources, minerals and energy, fire management and fire ecology.

The planning process began in February 1981 with issue identification and the other steps of the planning process. Consultation and coordination with agencies, organizations, and individuals occurred in a variety of ways throughout the planning process. A special effort has been made to ensure that the alternatives are consistent with approved plans of local and state government. The following is a summary of the public participation and in-house coordination which occurred during preparation of the Jarbidge RMP/EIS.

Issue Identification and Inventory Stage

- February 10, 1981 Notice of Intent to prepare Resource Management Plan (RMP) published in Federal Register.
- February 12, 1981 Boise District Advisory Council was briefed on RMP process and preliminary issues.
- March 6, 1981 RMP mailout sent to 491 agencies, organizations, groups, and individuals announcing the beginning of the planning process and soliciting the identification of issues and planning criteria. Approximately 140 people responded by prioritizing and identifying issues.
- April 3, 1981 News release issued to announce that 23 areas (3 in Jarbidge RMP) will be considered in the planning process for potential wilderness designation. Public meetings were held in Boise (4/15/81), Marsing (4/16/81), and Bruneau (4/22/81).
- April 10, 1981 District Office Staff meeting - preliminary issue identification.
- April 14, 1981 Public meeting at Three Creek, Idaho to explain issues and inventory procedures. Forty-two people (primarily livestock permittees and representatives from State and Federal agencies) were in attendance.
- April 28, 1981 State Office Staff meeting - issue identification.

- May 21, 1981 Area Manager meeting with local government officials and special interest groups (county commissioners, Idaho Cattleman's Association, etc.) to identify significant issues at Glens Ferry City Hall. Approximately 25 people attended.
- September 16, 1981 State Director briefing on issues identified for consideration in Jarbidge RMP.
- October 6, 1981 RMP mailout sent to 491 agencies, organizations, groups, and individuals to give results of initial issue identification.
- July 28, 1982 Meeting with Saylor Creek users at Glens Ferry City Hall to discuss inventory progress and the division of Saylor Creek into individual allotments.

In addition to the public meetings listed above, team members also made approximately 20 contacts with individuals concerning planning issues or the collection of inventory data.

Analysis of Management Situation and Formulation of Alternatives

During these steps of the planning process, an effort was made to contact over 500 agencies, organizations, and individuals who had expressed an interest in the development of the land use plan. Comments and input were received from a variety of sources, including the National Park Service, U.S. Forest Service, Idaho Department of Fish and Game, Idaho Department of Water Resources, County Commissioners, Grazing Associations, the Committee for Idaho's High Desert, Sierra Club, and several ranchers and agricultural development groups, as well as other individuals and groups. Following is a summary of the major public meetings, briefings, and in-house coordination which occurred during development of the alternatives and impact assessment stages.

- September 4, 1983 Land use plan briefing with Idaho Fish and Game at annual coordination meeting in Jerome.
- November 28, 1983 Preliminary identification of alternatives sent to 482 agencies, organizations, groups, and individuals soliciting comments.
- December 15, 1983 RMP open house held at Boise District Office. Twenty-one people attended and were briefed on the draft alternatives.
- January 17, 1984 Twin Falls County Commissioners meeting to discuss RMP alternatives at Twin Falls County Courthouse.
- February 10, 1984 State Director briefing on alternatives.
- February 14, 1984 Meeting with Nevada Department of Wildlife to discuss elk transplant and RMP alternatives at Jackpot, Nevada.

March 13, 1984 Meeting with 14 members of the Southside Grazing Association to discuss RMP alternatives. Held in Glens Ferry, Idaho.

March 27, 1984 Meeting with Hagerman Grazing Association to discuss RMP alternatives.

March 1984 Meeting with Region 4, Idaho Fish and Game to discuss impact assessments. Held in Jerome, Idaho.

April 6, 1984 Meeting with '71 Grazing Association to discuss RMP alternatives. Held in Buhl. Approximately 70 people attended.

April 23, 1984 Meeting with Region 3, Idaho Fish and Game to discuss impact assessments. Held in Boise.

April 30, 1984 Briefing for Congressional delegation (Senator Symms, Congressman Craig, and Senator McClure) on RMP alternatives. Held in Boise.

May 14, 1984 Meeting with Elmore County Commissioners to discuss RMP alternatives. Held at Elmore County Courthouse in Mountain Home.

EIS Public Review and Comment

The Draft Jarbidge RMP/EIS was mailed to approximately 1,000 individuals, organizations, and agencies for review and comment. Public hearings concerning the draft were held in Boise, Idaho on November 28, 1984; Twin Falls, Idaho on November 29, 1984; and in Three Creek, Idaho on December 5, 1984. Two open house meetings were also held. One in Twin Falls on November 14, 1984, and one in Boise on November 16, 1984. In addition to these, numerous meetings were held with interested individuals, groups, and organizations to discuss the Draft Jarbidge RMP/EIS.

A total of 154 individuals, Federal and State agencies, and organizations submitted written comments on the Draft RMP/EIS, while 35 oral comments were received at the public hearings.

The Draft and Final RMP/EIS was sent to the following individuals and organizations. This list is representative but not inclusive.

Federal Agencies

Department of Agriculture:

U.S. Forest Service
U.S. Soil Conservation Service

Department of Defense:

U.S. Air Force
Idaho National Guard

Department of Energy:
Bonneville Power Administration
Federal Energy Regulatory Commission

Department of the Interior:
National Park Service
U.S. Bureau of Indian Affairs
U.S. Bureau of Reclamation
U.S. Bureau of Mines
U.S. Fish and Wildlife Service
U.S. Geological Survey

Department of Transportation:
Federal Aviation Administration

Environmental Protection Agency

State Agencies, Commissions or Boards

Idaho Department of Agriculture
Idaho Department of Fish and Game
Idaho Department of Health, Welfare and Environmental Services
Idaho Department of Lands
Idaho Department of Parks and Recreation
Idaho Department of Water Resources
Idaho Public Utilities Commission
Idaho State Historic Preservation Office
Idaho Outfitters and Guides Board
Office of the Governor

Advisory Councils

Boise District Multiple Use Advisory Council
Boise District Grazing Advisory Board

Organizations

Ada County Fish and Game League
Appaloosa Horse Club
American Fisheries Society
American Wilderness Alliance
Association of Idaho Cities
Association of Western Native Plant Societies
Audubon Society
Boise Chamber of Commerce
BSU Conservation Group
Caldwell Chamber of Commerce
Committee for Idaho's High Desert
Desert Bighorn Sheep Council
Desert Fishes Council
Desert Raiders
Desert Rats
Desert Research Institute

Desert Tortoise Council
Eagle Valley Environmentalists, Inc.
Earth First
Federation of Western Outdoor Clubs
Friends of the Earth
Gem County Rock and Mineral Society
Good Sam Club
Idaho Archaeological Society
Idaho Association of Counties
Idaho Carey Act Association
Idaho Cattlemen's Association
Idaho Conservation League
Idaho Environmental Council
Idaho Historical Society
Idaho Mining Association
Idaho Native Plant Society
Idaho Natural Areas Coordinating Committee
Idaho Outdoor Association
Idaho Outfitters and Guides Association
Idaho Petroleum Council
Idaho Rare Birds Committee
Idaho State Grange
Idaho Trail Machine Association
Idaho Wildlife Federation
Idaho Woolgrowers Association
Institute for High Desert Studies
League of Women Voters
Magic Valley Gem Club
Mountain Home Air Force Base Sportsman Club
National Council of Public Land Users
National Public Land Advisory Council
National Public Lands Task Force
National Rifle Association of America
National Wildlife Federation
Natural Resource Defense Council
Nature Conservancy
Northwest Mining Association
Oregon Wilderness Coalition
Owyhee Cattlemen's Association
Owyhee County Historical Society
Pacific League Foundation
Pacific Northwest 4-Wheel Drive Association
Public Lands Council
Sagebrush Rebellion, Inc.
Sierra Club
Snake River Audubon Society
Snake River Gem Club
Society for Range Management
Treasure Valley Club
Treasure Valley Rock and Gem Club
United 4 Wheel Drive Association
Wilderness Institute
Wilderness Society

Wildlife Management Institute
Wildlife Society
Wildlife Research Institute

Concerned or Affected Individuals, Companies, Businesses, and Schools

ARCO
Noranda Exploration, Inc.
Rivers Odysseys West
Salmon River Kayaks
TEXACO
Affected grazing permittees
Other businesses and industries
Colleges and universities
Desert Land Entry applicants
Other individuals

Elected Officials

Federal:

Senator James McClure
Senator Steve Symms
Congressman Larry Craig
Congressman George Hansen

State:

Governor John Evans
Senator James Risch
Senator Walt Yarborough
Representative Gerry Montgomery
Representative Lyman Winchester

Local:

Elmore County Commissioners
Owyhee County Commissioners
Twin Falls County Commissioners

Jarbidge Wilderness Environmental Impact Statement

A separate Draft Jarbidge Wilderness EIS has not been reviewed by the public. Wilderness was addressed in the Draft Jarbidge Resource Management Plan and Draft Environmental Impact Statement. Public consultation, coordination, and participation occurred during the preparation of that document. Issues contained in this Final Jarbidge Wilderness EIS were selected by BLM specialists and managers from comments received on the Draft Jarbidge RMP/EIS and information contained in the Proposed Jarbidge Resource Management Plan and Final Environmental Impact Statement.

Comments Received

All letters and oral testimony containing wilderness comments are listed on the following pages. Of the written and oral comments received on the contents of the Draft Jarbidge RMP/EIS, 102 written comments and 23 oral comments addressed wilderness concerns.

All letters containing wilderness comments, oral testimony containing substantive wilderness comments, and all Federal and State agency letters are reprinted in this final wilderness EIS. BLM responses to comments are numbered to correspond with the appropriate comment and appear with each reprinted letter or testimony. The letter and oral testimony numbers are the same as those used in the Proposed Jarbidge RMP/Final EIS, however, the substantive comments specific to wilderness have been renumbered.

Reviewing public comments must be done in the context of the information that appeared in the Draft Jarbidge RMP/EIS. Wilderness suitability alternatives addressed in the Draft RMP/EIS included:

Alternative A - No Wilderness

Alternative B - Bruneau River/Sheep Creek WSA	- 17,929 acres
Jarbidge River WSA	- 13,481 acres
King Hill Creek WSA	- <u>26,389 acres</u>
Total Wilderness Suitability	- 57,799 acres

Alternative C - Bruneau River/Sheep Creek WSA	- 17,929 acres
(Preferred Jarbidge River WSA	- 49,881 acres
Alternative) King Hill Creek WSA	- <u>26,389 acres</u>
Total Wilderness Suitability	- 94,199 acres

Alternative D - Bruneau River/Sheep Creek WSA	- 104,406 acres
Jarbidge River WSA	- 75,118 acres
King Hill Creek WSA	- <u>29,309 acres</u>
Total Wilderness Suitability	- 208,833 acres

All of the above alternatives included a recommendation for a 57,000 acre National Wild and Scenic River on 121 miles of the Bruneau River drainage.

Of the written and oral comments concerning wilderness suitability recommendations, 28 favored Alternative A (no wilderness), one favored Alternative B (57,799 acres wilderness), five favored the Preferred Alternative (94,199 acres wilderness), and 24 favored Alternative D (all wilderness). One of the comments supporting the no wilderness alternative was a petition containing 48 signatures. Fourteen of the comments supporting no wilderness supported National Wild and Scenic River designation of the Bruneau River drainage.

In addition, two comments favored wilderness suitability recommendations that were combinations of alternatives, 8 generally opposed wilderness designation, 5 generally supported wilderness designation, and 35 favored an enlarged 340,000 acre wilderness proposed by the Committee for Idaho's High

Desert (CIHD). Support for the enlarged wilderness was generated by a CIHD "Desert Alert" sent to conservationists.

List of Comments on Draft Jarbidge RMP/EIS
 Pertaining to Wilderness or Wild River Designations

WRITTEN COMMENTS

Log #	Name	Location	Representing
1.	M. Baldwin	Seattle, WA	Self
2.	Kent Erskine	Ashland, OR	Silver Cloud Farm
3.*	Martin J. Gabica	Boise, ID	Self
4.	Elliott Bernshaw	Salt Lake City, UT	Self
5.*	Harry Melts	Porthill, ID	Self
9.*	USDI, Fish & Wildlife Service	Boise, ID	Federal Agency
10.	Dean Littlepage	Anchorage, AK	Self
11.	Lawrence E. Nielson, Ph.D.	Redmond, OR	Self
12.*	Harry Melts	Porthill, ID	Self
13.	Walter B. Wells	Buhl, ID	Self
15.	Stan Mai	Filer, ID	Self
16.	Darlene Emry	Boise, ID	Self
18.	USDI, Geological Survey	Reston, VA	Federal Agency
19.	USDA, Soil Conservation Service	Boise, ID	Federal Agency
23.	Hildegard Raeber	Ketchum, ID	Self
24.	Susan Wood-Ray	Hagerman, ID	Self
25.	Gene & Shane Walker	Shoshone, ID	Self
26.	C.J. Stapp	Gooding, ID	Self
28.	Rhetajene Fairchild	Burley, ID	Self
30.	Dusty Young	Hailey, ID	Self
31.	Ellen Trueblood	Nampa, ID	Self
32.	Gerald Tews	Filer, ID	Self
34.	Bruce Bowler	Boise, ID	Self
36.	Daniel A. Poole	Washington, D.C.	Wildlife Management Institute
38.	Jill Wyatt	Bremerton, WA	Self
39.	Chris Mazzalo, D.D.S.	Ketchum, ID	Self
40.*	Ed Speer	Lakewood, CO	Tenneco Minerals
41.*	James S. Fereday	Corvallis, OR	Self
42.	Robert Jones	Pocatello, ID	Self
43.	Lecia Harris	Pocatello, ID	Self
46.*	Kirk Vincent	Berkeley, CA	Self
47.*	Kay Hammel	Boise, ID	Self
48.*	Frank R. Florence	Twin Falls, ID	Self
50.	C. Lister	Seattle, WA	Self
51.	Jack Trueblood	Nampa, Id	Self
52.	Richard Anderson	Jackson, NH	Self

Log #	Name	Location	Representing
53.	Ethel Thorneley		Self
54.*	USDI, Geological Survey	Reston, VA	Federal Agency
55.	Alan Reynolds	Ketchum, ID	Self
56.*	Steve Caicco	Boise, ID	Idaho Natural Heritage Program
57.	Brent Knapp	Boise, ID	Self
58.	Jerry Hughes	Cambridge, ID	Hughes River Expeditions
60.	Stanley Albee	Buhl, ID	Self
61.	Gerald A. Jayne	Idaho Falls, ID	Self
62.	Dennis Fitzgerald	Hailey, ID	Self
63.	Gary Stowell	Bruneau, ID	Self
64.	George Holmes	Twin Falls, ID	Self
65.	Mr. & Mrs. Frank Mosman	Eagle, ID	Self
67.	A.R. Hausrath	Idaho Falls, ID	Idaho Environmental Council
68.	Jeff Ruprecht	Twin Falls, ID	Prairie Falcon Audubon Society
69.	Gary W. Stitzinger	Ketchum, ID	Self
70.*	Robert Barton	Rogerson, ID	Self
71.	Julia Conway Welch	Caldwell, ID	Self
72.	Bruce Aitken	Boise, ID	Self
73.	Burt Ross	N. Andover, MA	Self
75.*	Idaho Dept. of Fish & Game	Jerome, ID	State Agency
76.	Suzanne Valder	Boise, ID	Self
77.	Dorian Daffin	Boise, ID	Self
78.	Steve Jakubowics	Boise, ID	Self
79.*	Idaho State Historical Society	Boise, ID	State Agency
80.*	Idaho Dept. of Lands	Boise, ID	State Agency
82.	Idaho Dept. of Water Resources	Boise, ID	State Agency
83.	Margaret J. Pratt	Twin Falls, ID	Self
84.	Jon Marvel	Hailey, ID	Self
85.	Paul Fritz	Boise, ID	American Wilderness Alliance
86.	Martin McGregor	W. Jordan, UT	Self
88.	Grant Simonds	Boise, ID	Self
89.	Charles C. Yoder	Boise, ID	Sierra Club, Middle Snake Group
90.	Martha E. Quigley	Buhl, ID	Self
91.	Wade Quigley	Buhl, ID	Self
94.	Randall Brewer	Rogerson, ID	Self
96.*	Frank L. Bachman	Boise, ID	J.R. Simplot Company
99.	Tom Blessinger	Boise, ID	"71" Livestock Association
100.	Dave Bivens	Boise, ID	Idaho Cattle Association
102.*	Jane Leeson	Boise, ID	The Wilderness Society, N. Rockies Region

Log #	Name	Location	Representing
103.	James E. McFarling	Spokane, WA	Self
105.	Harold C. Miles	Nampa, ID	Idaho Consumer Affairs, Inc.
106.*	Pete Wyman	Spokane, WA	Self
107.*	Rose Strickland	Reno, NV	Sierra Club
108.	Allan R. Ansell	Boise, ID	Idaho Power Company
109.	Brian Schaeffer	Boise, ID	Self
110.*	Jeffrey C. Fereday	Boise, ID	Self
111.	Michael A. Guerry	Buhl, ID	Guerry, Inc.
112.*	Frank Vaughn	Lakeview, OR	Self
113.*	Peter Bowler	Bliss, ID	Self
114.*	Randall E. Morris	Mountain Home, ID	Committee for Idaho's High Desert
115.	L.E. Drexler	Twin Falls, ID	Magic Valley Trail Machine Assn.
118.	Steve Miller	Twin Falls, ID	Self
119.	Julia Bent, D.V.M.	Seattle, WA	Self
120.	John R. Swanson	Berkeley, CA	Self
125.	Sheldon Bluestein	Boise, ID	Self
127.	Kristen Fletcher	Ketchum, ID	Self
128.	U.S. Environmental Protection Agency	Seattle, WA	Federal Agency
130.*	Stanley T. Boyd	Boise, ID	Idaho Wool Growers Association
131.	William R. Meiners	Boise, ID	Self, Idaho Wildlife Federation & Idaho Natural Resources Legal Foundation
132.	Robert Mason	Elko, NV	Nevada Chapter; The Wildlife Society
134.	Howard C. Ferris	Portland, OR	Pacific Power & Light Co.
135.	George Wuerthner	Missoula, MT	Self
137.	Idaho Dep't. of Parks & Recreation	Boise, ID	State Agency
138.	S.K. Howard	Bruneau, ID	Howard Ranches
139.	Dept. of the Air Force	San Francisco, CA	Federal Agency
140.*	Idaho Air National Guard	Boise, ID	Federal Agency

ORAL TESTIMONY
Boise, Idaho November 28, 1984

<u>Log #</u>	<u>Name</u>	<u>Location</u>	<u>Representing</u>
T-2	W.A. McGrew	Glenns Ferry, ID	Elmore Cattleman's Assn.
T-3	William R. Meiners	Meridian, ID	Idaho Wildlife Federation
T-4	Gerald Tews	Filer, ID	Self
T-6*	Brent Knapp	Boise, ID	Self
T-7	Ray Blair	Glenns Ferry, ID	Glenns Ferry Grazing Association
T-8*	Randy Morris	Mountain Home, ID	Committee for Idaho's High Desert
T-9*	Howard Emry	Boise, ID	Northwest Federation of Mineralogical Soc, Inc.
T-10	Wallace B. Sterling	Boise, ID	Idaho Trail Machine Assn.
T-11*	Stan Boyd	Boise, ID	Idaho Wool Growers Assn.

Twin Falls, Idaho November 29, 1984

T-18*	Bob Barton	Rogerson, ID	Self
T-19	Maurice Guerry	Castleford, ID	Self
T-20	Dusty Young	Hailey, ID	Self
T-21	John Faulkner	Gooding, ID	Self
T-22*	Gene Anthis	Twin Falls, ID	Desert Canyon Mines
T-23	Steve Herrett	Twin Falls, ID	Self

Three Creek, Idaho December 5, 1984

T-26	J.W. Swan	Rogerson, ID	Swan Land & Livestock Co.
T-28	Mike Guerry	Buhl, ID	Self
T-29	Chet Brackett	Rogerson, ID	Self
T-30	Rolland Patrick	Rogerson, ID	Devil Creek Ranch
T-32	Ben Gnesa	Rogerson, ID	Seven Triangle Ranch
T-33	Bert Brackett	Rogerson, ID	Self
T-34	Randall Brewer	Rogerson, ID	'71 Livestock Assn.
T-35	Owen Barton	Rogerson, ID	Self

* Letters or oral testimony containing substantive comments that are responded to in this document.

RESPONSES TO WRITTEN COMMENTS AND ORAL TESTIMONY

RESPONSE TO WRITTEN COMMENTS

Response to 3.1 - Natural (lightning caused) wildfire is recognized as an important component affecting ecological balance. A separate wilderness management plan will be prepared for each designated wilderness area. That plan will address fire and will identify areas where fire may be allowed to burn and under what conditions.

Response to 3.2 - All claims would be examined to determine validity, and only valid claims would be allowed in any designated wilderness areas. All other lands within designated wilderness areas would be withdrawn from all forms of appropriation under the mineral leasing and mining laws.

Response to 5.1 - The impact of wilderness designation on recreational motor vehicle use is an issue for analysis in this final wilderness EIS. Roads and ways within the WSA boundaries are shown on the various maps. Management actions regarding these roads and ways and impacts on users are identified for each alternative.

Response to 5.2 - Our definition of a road is taken from the Wilderness Inventory Handbook published by BLM in 1978. A road is a travel route that has been improved and maintained by mechanical means to insure relatively regular and continuous use. A way maintained solely by the passage of vehicles does not constitute a road.

Response to 9.1 - The following sensitive plant species are found within the WSA areas:

Lepidium davisii Davis' peppergrass
Leptodactylon glabrum Bruneau River phlox
Astragalus atratus morning milkvetch

Davis' peppergrass and morning milkvetch are federally listed as Category 2 or candidate species (insufficient data to support listing as either threatened or endangered). Erigeron latus is not known to occur within the WSAs. There are no known federally listed threatened or endangered plants or animals within the WSAs.

Response to 12.1 - See Response 5.1

Response to 12.2 - The referenced configurations for the Bruneau River-Sheep Creek and Jarbidge River WSAs were considered but not included as separate alternatives. Our analysis concluded that these configurations would lead to decreased wilderness values for those areas designated as wilderness. Motorized recreational vehicle use, particularly motorcycle and ORV use, would increase in the nondesignated areas (cherry stem roads) and decrease wilderness values in the adjacent designated wilderness areas. Unauthorized motor vehicle use in the designated wilderness would also likely occur.

Response to 18.1 - Potential changes in infiltration rates and coliform bacteria concentrations were not selected as issues for analysis in this final wilderness EIS but were addressed in the final Jarbidge RMP/EIS. We do not anticipate that increased grazing within the WSAs under the proposed action would significantly affect infiltration rates or coliform bacteria concentrations.

Response to 40.1 - The mineral evaluation in the Jarbidge RMP was based on an evaluation of all known geologic literature and mining activity related to the area involved. This includes the relationship between caldera structures and their potential for secondary mineralization due to resurgent activity. None of the geologists that have worked on the ground in the area involved have told us of any signs that metallic mineralization has occurred within the area involved. We have to go with the best information available, which is, that mineral potential is nominal. Speculation on discoveries in areas that fit a conceptual model but have no corroborating evidence has limited use in mineral potential determinations. It is not discounted but is considered only one line of evidence to use when making a generalized area evaluation.

The Geological Survey and Bureau of Mines conducts mineral surveys of areas recommended as suitable for inclusion in the National Wilderness Preservation System. Findings of these surveys will be evaluated prior to the Secretary of the Interior's final recommendation to the President as to the suitability or nonsuitability of areas for designation as wilderness.

Response to 41.1 - See response to 70.2, 102.1, and 106.2.

Response to 46.1 - The wilderness study area boundaries were determined by the presence or lack of naturalness and outstanding opportunities for solitude and/or primitive recreation. The alternatives in the EIS address all areas that meet these criteria. Areas outside the WSA boundaries do not have sufficient wilderness characteristics to warrant management as wilderness.

Response to 47.1 - See response to 9.1.

Response to 47.2 - See response to 46.1.

Response to 47.3 - The evaluation of wilderness characteristics has been revised. An area in poor or fair ecological condition does not necessarily mean that all wilderness characteristics are low. Characteristics other than those relating to vegetative values may be high.

Response to 47.4 - See response to 102.1.

Response to 48.1 - Provisions exist to allow for continued maintenance of existing facilities within designated wilderness areas utilizing motor vehicles. This issue is addressed in this final wilderness EIS.

Response to 48.2 - Military aircraft use in the area is recognized as an impact on wilderness values (solitude) and is addressed in this final wilderness EIS.

Response to 54.1 - We also have found it difficult to assess the mineral potential due to a scarcity of data. A list of all the geologic materials reviewed would in general be a list of all the literature that covers southwestern Idaho. None of these mention any potential for metallic mineralization in the area covered by the Jarbidge Resource Area south of the Snake River or within the King Hill Creek WSA. Diatomite potential is based on Hal Malde's work on the Glens Ferry Formation and the other sedimentary beds that crop out in the area. Since the potential for the presence of energy and mineral resources was not identified, a map was not prepared. The impact of wilderness designation on the development of potential and known mineral resources is an issue for analysis in this final wilderness EIS and has been addressed.

Response to 56.1 - See response to 9.1.

Response to 56.2 - Management stipulations within the land use plan call for protection of sensitive species regardless of wilderness designation or nondesignation.

Response to 70.1 - Access to the WSA boundary is limited, but what access there is, is of good quality. Mobility, by foot or horse, on the plateau of the WSA is easy. The description of the area has been revised to indicate that the plateaus are in poor condition and the canyons are in good condition.

Response to 70.2 - The number of cultural resource sites in this final Wilderness EIS differs from the number identified in the Jarbidge RMP/EIS. The WSA boundaries encompass only portions of the lands and also extend beyond the lands addressed in the Jarbidge RMP/EIS. The numbers of cultural resource sites for the WSAs in this final Wilderness EIS are correct.

Response to 70.3 - The preferred alternative now recommends both sides of the plateau as nonsuitable for wilderness. See also response to 106.2.

Response to 75.1 - The approved Jarbidge RMP included ACEC designation for the bighorn sheep habitat area. Management guidelines identified for that ACEC are included under the proposed action in this final Wilderness EIS and should adequately protect bighorn sheep habitat.

Response to 75.2 - The identified provisions would generally be followed under the proposed action and are addressed in this final wilderness EIS.

Response to 75.3 - The BLM wilderness management policy allows for the use of helicopters at the discretion of the State Director.

Response to 75.4 - The more palatable climax dominant grasses and forbs have been depleted on most of these sites. A major portion of the sites are too stony to seed artificially with drills. Pelletized seeding is not likely to be cost-effective. In addition, major portions of the Jarbidge River WSA are within crucial mule deer winter range and would have low priority for brush control. Considering the relative depletion of many of the herbaceous species, we do not expect significant improvement in condition over the 20-year life of the RMP, regardless of changes in livestock management.

Response to 75.5 - The all wilderness alternatives for the Bruneau River-Sheep Creek and Jarbidge River WSAs encompass all of the identified bighorn sheep habitat within the WSA boundaries. Bighorn sheep habitat areas outside the WSA boundaries (extending into Nevada) were not analyzed since they did not meet the wilderness study criteria for inclusion as WSAs. See response to 46.1.

Response to 79.1 - Management actions proposed for cultural resources in the Jarbidge RMP include the nomination to the National Register of Historic Places of 282 cultural resource sites. This nomination will be made in the form of a "thematic site district," the boundary of which encompasses approximately 37,000 acres. Since the real extent of each site is about one acre or less, the land in between these sites is of little consequence to the nomination, and what is really being nominated would be less than 282 acres spread over the 37,000 acres area. This site district lies partially within two WSA's: the Bruneau River-Sheep Creek WSA and the Jarbidge River WSA. The Bruneau River-Sheep Creek WSA includes about 30,000 acres of the site district and 163 cultural sites, and the Jarbidge River WSA includes approximately 6,000 acres of the site district and 40 cultural resource sites. The remaining 1,000 acres and 70 cultural resource sites of the site district lie outside the WSA boundaries. Designation of the site district does not preclude existing or future uses. All ground disturbing activities within the site district will be subject to standard operating procedures for cultural resource evaluations.

Response to 80.1 - This issue was considered but not analyzed in detail because of the intention of BLM, at the request of the State of Idaho, to exchange state land inholdings in designated wilderness areas.

Response to 96.1 - Private lands at Indian Hot Springs are not included in the WSAs or the wilderness proposals. The livestock crossing utilizes an existing road which would not be closed to motor vehicle use since it is important access for recreationists, miners, cattlemen, etc.

Response to 96.2 - Military aircraft use in the area is recognized as an impact on wilderness values and is addressed in this final wilderness EIS.

Response 102.1 - Nonsuitability adjustments include reductions in wilderness acreages because of relatively low wilderness values plus concerns for the ability to manage areas as wilderness due to ORV access, external influences, and topographically protectable or definable boundaries. Lands are recommended nonsuitable due to manageability problems and conflicts with range development projects, livestock grazing, wildfire, and motorized recreational use. The discussion on costs has been deleted.

Response to 106.1 - See response to 102.1.

Response to 106.2 - Nonsuitable recommendations for the plateau areas of the Bruneau River-Sheep Creek and Jarbidge River WSAs were made to allow for continuation of semi-primitive motorized recreation use and implementation of the livestock grazing program. Under wilderness designation, it would be extremely difficult to prevent unauthorized motor vehicle use in the plateau areas. Wildfires could become larger due to suppression constraints, and

rehabilitation of the burned areas to prevent the invasion of non-native cheatgrass would be difficult. The plateau areas would be subject to the bighorn sheep habitat constraints within the ACEC.

Response to 107.1 - See response to 106.2.

Response to 110.1 - Desert plateau and basalt canyon landforms are present in twelve other WSAs being considered for wilderness designation in southwest Idaho (Owyhee Canyonlands, Jacks Creek, and Owyhee wilderness study efforts).

Response to 110.2 - See response to 106.2.

Response to 112.1 - All WSAs are managed to meet VRM Class I standards. All designated wilderness areas are also managed under Class I standards. Areas not designated as wilderness by Congress may be reevaluated and managed under other VRM classes.

Response to 112.2 - The phrase "effectively managed" is found in the final Wilderness Study Policy published by the BLM in the Federal Register on February 3, 1982; Vol. 47, No. 23, pp. 5098-5122. The phrase "effectively managed" means that an area can be managed to maintain the public benefits which justifies wilderness designation.

Response to 112.3 - The maps in this final wilderness EIS have been revised to show the WSA boundary as excluding four of the referenced reservoirs. One reservoir remains within the WSA.

Response to 112.4 - It is the BLM's position that topographic and vegetative screening is good to excellent throughout the unit as a whole. The fact that the best "screening" is found in the northern part of the unit doesn't negate the first statement.

Response to 112.5 - Most canyon visitors are whitewater boaters. Boating is a linear experience. The canyon's length and meandering nature along with the presence of numerous side canyons (a number of which provide access to the canyon rim) do provide an unconfined feeling to users traveling the canyon by boat or by foot.

Response to 112.6 - The maps in this final EIS have been revised to show the private land in T. 12 S., R. 7 E., Section 33 as outside the WSA boundary.

Response to 112.7 - The status of the reservoirs referred to is as follows:

- T.13S., R.7E., SW1/4 of Sec. 26 - The reservoir is at the end of a cherrystem road and is technically outside of the WSA.
- T.13S., R.8E., SW1/4 of Sec. 32 - The map has been corrected. This reservoir does not exist.

T.14S., R.7E., SW1/4 of Sec. 11 - The WSA boundary excludes this reservoir.

T.14S., R.7E., SE1/4 of Sec. 14 - This reservoir is included in the WSA.

T.14S., R.7E., SE1/4 of Sec. 24 - This reservoir is included in the WSA.

The Poison Butte storage reservoir is immediately adjacent to and outside of the WSA boundary. The map has been corrected.

Response to 112.8 - Both statements are true. Persons wanting to view the canyon will congregate on the canyon rim to do so. The canyon and associated draws present a long enough area to congregate along so that the overall effect would be to disperse use.

Response to 112.9 - These sections have been revised and the references to wildlands, wilderness dependency, and extreme intolerance to human presence have been deleted.

Response to 112.10 - The references to potential bald eagle habitat have been deleted.

Response to 112.11 - The wilderness management policy allows for the closing of roads and ways to enhance manageability of the designated wilderness areas.

Response to 112.12 - This section has been revised to specifically identify impacts of nondesignation on wilderness values for all alternatives. The referenced statement addressed potential loss of wilderness values for all of the WSA acreage.

Response to 112.13 - Without Congressional protection by wilderness designation, proposed developments could be authorized at the local BLM district level. The President can only override the Congressional designation under circumstances defined by the Wilderness Act and the enabling legislation for a specific wilderness area.

Response to 112.14 - Miners operating the Bruneau jasper mine provided the information concerning the value of the jasper.

Response 113.1 - See response to 106.2 and 110.1.

Response to 114.1 - We recognize the many values and qualities of the Bruneau-Jarbridge ecosystem. We feel that management of these values can be determined on their own merits without comparing or ranking them with other rivers. Therefore, we have not compared them with other similar free-flowing rivers. See also response to 46.1.

Response to 114.2 - Management stipulations in the various alternatives call for the protection of the referenced species regardless of wilderness designation or nondesignation. Therefore, this issue was not analyzed in detail.

Response to 114.3 - Consideration of WSAs outside of the Jarbridge Resource Area is not within the scope of this final wilderness EIS. The

information referenced will be included in other documents being prepared as part of the wilderness study process. These documents will be made available to the public.

Response to 114.4 - The proposed action for the Jarbidge River WSA has been revised to exclude both the eastern and western plateau areas from a suitable wilderness recommendation. See also response to 102.1 and 106.2.

Response to 114.5 - The proposed action has been revised to exclude both plateau areas in the Jarbidge River WSA from a suitable wilderness recommendation. We do not feel that the referenced projects outside of the WSAs would be a significant visual intrusion. They are low profile projects and would be substantially unnoticeable except that vegetation change could produce visual contrast. This contrast is already found in nature due to lightning fires. Wilderness management policy doesn't allow for buffer zones to protect lands adjacent to wilderness areas from development. Impacts on naturalness from development in the plateau areas within the WSAs are addressed in detail in this final EIS.

Response to 114.6 - See response to 46.1.

Response to 130.1 - See response to 48.1.

Response to 134.1 - The approved Jarbidge RMP identifies lands extending approximately 50 miles along the Bruneau and Jarbidge Rivers as a utility avoidance area in order to protect bighorn sheep, scenic (wild and scenic river) values, and natural (wilderness) values. Establishing a utility corridor through this area was not selected as an issue for analysis in this final wilderness EIS, however, a statewide utility corridor study is being conducted to address the concern with transmission of electrical energy.

Response to 139.1 - See response to 140.1.

Response to 140.1 - We do not recommend any reduction in military aircraft use in any of the WSAs because of wilderness recommendations. See also response to 48.2.

RESPONSE TO ORAL TESTIMONY

Response to T-6.1 - The proposed action in this final wilderness EIS has been revised to exclude all of the King Hill Creek WSA from a suitable wilderness recommendation.

Response to T-6.2 - Impacts of nondesignation on wilderness values has been addressed in detail for the proposed action and alternatives.

Response to T-6.3 - See response to 102.1 and 106.2.

Response to T-6.4 - See response to T-6.1 and 102.1.

Response to T-8.1 - See response to 106.2 and 114.4.

Response to T-9.1 - This issue has been selected for detailed analysis in this final EIS. Also see response to 3.2.

Response to T-11.1 - See response to 5.1 and 48.1.

Response to T-11.2 - See response to 114.4.

Response to T-18.1 - See response to 114.4.

Response to T-18.2 - The description of the area has been revised to indicate that the plateaus are in poor ecological condition and the canyons are in good ecological condition.

Response to T-18.3 - The western plateau area of the Jarbidge River WSA has been excluded from a wilderness designation recommendation in the proposed action in this final EIS. The impact of wilderness designation on resource values and existing uses including livestock grazing and recreational use is addressed in detail in this final wilderness EIS.

Response to T-22.1 - This issue has been selected for detailed analysis in this final EIS. See also response to 3.2.

ORAL TESTIMONY

(Substantive wilderness comments offered in oral testimony have been extracted and are presented below)

Brent Knapp

Comment T-6.1: King Hill area is a place that I hadn't been to, but I heard an awful lot about what is called the Camas Trail wilderness, and from what I have heard about that area, I do think that some portions of it, at least, should be wilderness, and perhaps King Hill is one since the BLM is recommending it for wilderness.

Comment T-6.2" In terms of impacts of nondesignation on wilderness values, I really think that you are going to get some substantial impact, especially out on the plateaus if nondesignation is the ultimate outcome.

Comment T-6.3: Another quote, and this is from J-16, "The wilderness values of the plateau areas are not sufficient to warrant the cost of management." We are told in the RMP that the plateau areas are in poor ecological condition, and this is the reason for not designating them as wilderness.

Comment T-6.4: Another quote is, "It is felt that the influence of the road adversely effects manageability." This is at J-16, refers to King Hill wilderness study area, and there is I think down in Arizona, a wilderness area that BLM is right next to a major highway, so I don't think asking for a road is a reason for cutting it out of wilderness consideration.

Randy Morris

Comment T-8.1: Excluding the east rim of the Jarbidge is also irrational. It will expose the visual resources of the west rim of the Jarbidge to degradation by activities on the east rim and the plateaus.

There are also ample precedents for dealing with low grade roads and ways in wilderness. We believe that the access management problem can be overcome, and we do not believe that that is a significant enough reason to exclude the east rim of the Jarbidge Wilderness Study area.

Howard Emry

Comment T-9.1: The Northwest Federation is concerned that wilderness designation of this part of the canyon will put unnecessary restrictions on the mining of this jasper. Although the wilderness designation cannot cancel present mining claims, it can prevent the establishment of future claims and would make the present mining operations more expensive and restrictive. This, in turn, could increase the future price of this valuable jasper, as greater operating costs would have to be passed on to the customer, which would include the rockhounds.

Therefore, we feel that these mining claims and the jasper deposits located within their jurisdiction should be excluded from any wilderness proposals.

Stan Boyd

Comment T-11.1: In regards to the various wilderness proposals, we took a look at the Alternative C, the preferred alternative, and examined the some 94,000 acres proposed as wilderness. One thing that came as we sat down with these several ranchers, they all started drawing lines through the map and would say, Well, here's a road here that I use quite often. And we got right down to it. And what it was -- it's not technically a road by the wilderness definition, but rather a way.

The problem is, we're taking regulations for wilderness that were designed for rugged, mountainous, you know, areas and applying that to the BLM land. And what you have there -- there was some rancher a hundred years ago, drove a wagon up a draw, and that became the access point into the area. There was simply no need for a professional survey job or for, you know, actual road construction to make what is deemed a road.

But these ways, or roads as we refer to them, provide a very keen access area for livestockmen, for BLM personnel, for hunters, for fishermen, for rockhounds, trail machines, you know, the whole spectrum. We feel that a lot of the wilderness areas will deny proper access and established access into these areas that is now being used.

Comment T-11.2: Another thing I'd like to point out is that I really -- in a lot of these wilderness areas it will be very hard to enforce wilderness there. There are -- as you well know, there are very high plateau areas,

very sloping lands that are very easy -- you know, easily drove over by four-wheel drive pickups, or whatever.

I think the BLM certainly needs to take a look at, once an area is designated as wilderness, what is the potential of severe abuse, you know, in the area. I think you're really asking for a headache in this area by designating certain areas as wilderness that you can simply pull off the road and take off in. And these areas should be left in the multiple use.

Bob Barton

Comment T-18.1: We're opposed to wilderness in this area on the plateau especially for the same reasons that you have eliminated the area on the east side of the Jarbidge. We feel the wilderness quality is low. You will have terrific manageability problems in trying to manage the area as wilderness.

Comment T-18.2: There's little topographic variation of the plateau country. You've listed it as primary poor condition in the inventory. In the EIS, you say that it's -- or in the RMP, you say that it's all good, in fair condition when you're talking about it as potential wilderness. If you check into a map, it's all inventoried as poor condition.

Comment T-18.3: The western boundary of the proposed wilderness area is all sections, lines or roads, with no topographic barriers to make management easy. I think you're required to in addressing this or studying this as wilderness, to assess the impacts on other resource values as it outlines in page J-3. You also mention on J-19 that livestock grazing is adversely affected in wilderness. I think those two items have got to be looked at.

Access to one of the most intriguing areas in that area, and the area that people go into Multiple Use 10 now for, is the natural arch that is in what we call "Arch Canyon," which you call Cougar Canyon. I think you're going to be discriminating against a greater number of people by designating this wilderness that are using the area now.

The only people that we see going into the area is consistently to visit the arch are primarily elderly retired people, historical societies, people that enjoy the scenic value in that. And they're not going to be able to walk five miles to get to the arch.

I think you're discriminating against a lot of the people that are using the area, hunters, fishermen. For somebody that's going to come in and walk and enjoy the area -- maybe two, but why aren't they out there now. We don't see anyone walking on the plateau areas getting this great primitive experience you talk about.

The only people that are walking are those that are coming back to the ranch because their cars broke down, and they need some help. I really think this is an important issue and that all people need to have the opportunity to get to that canyon to see it. And they're not going to walk two or three miles to get over there.

Gene Anthis

Comment T-22.1: I am Gene Anthis from Twin Falls. I am the controlling owner of the Bruneau-Jasper Mining claims in the Indian Hot Springs area on the Bruneau River, which is in the wilderness study area. And I myself am very much interested in preserving the area as wilderness and wild river, but I would like to have the mining interest protected for the future mainly for the people that enjoy the jasper as a -- that I mine there.

WRITTEN COMMENTS RECEIVED ON THE DRAFT JARIBDGE RMP
ADDRESSING WILDERNESS CONCERNS ARE REPRODUCED
ON THE FOLLOWING PAGES



Dear Sirs,

I have read the massive Draft Jarbidge RMP and EIS, and would like to thank you for the clarity and sufficiency of information therein.

I stress in my request the protection of the maximum land possible in wilderness for the Jarbidge and Brouseau canyons. I also ask for protection of big game herd winter range, and limitations on ORV use in critical areas, or outright prohibition. The areas of current seedlings and range use shall continue to be used judiciously, while the already easily protected canyons can be isolated from stock use easily, and may be protected.

These rivers are gems, and worthy of preservation.

Thank you,

Kent Erskine

Mr. Carson 10/9/84
These are my comments on the RMP/EIS for the Jarbidge RMP.

After studying the draft EIS though some of the A.C. etc. may make more sense at this moment in time, I truly feel that A.D. is the proper prescription.

Given that so much land is converted from its natural state to something man wants it to be every day, I say we include a lot of this land in the NAT. WILDERNESS SYSTEM.

Idaho Wellness Center

Steven L. Schneider, M.D.
Martin J. Gabica, M.D.
Family Practice

3

October 9, 1984

Jerry Carson
Jarbidge Area Manager
Boise District Office - BIA
3948 Development Avenue
Boise, ID 83705

Dear Sir,

I would like to enter this comment into the public record concerning the Jarbidge Resource Management Plan and Environmental Impact Statement of August, 1984.

I would like to commend the people responsible for this RMP-EIS and the preparation of this document. It is one of the finer EIS statements I have read.

I would like to enter my comment in support of Alternative D for a management plan alternative. Having been a user of many of the areas addressed in this plan I know the state of the land at the present time. I feel from my observation that there has been a significant amount of destruction particularly in the Jarbidge plateau area from livestock grazing. Therefore, I feel that the grazing should be limited to a greater extent than the preferred alternative would allow. I don't feel that the Alternative D₁ which completely does away with livestock grazing, is appropriate as this is a necessary commercial use of our land, but I do feel that it should be limited to less, rather than more, grazing than is presently occurring. I also feel that the larger amount set aside in alternative D for wilderness should be withdrawn from multiple use. My primary reason for taking this stand is that the types of use these lands would be suitable for on a multiple use concept would benefit very few of the residents of Idaho whereas more wilderness in the area would benefit more people. Many of us in Idaho can appreciate the advantages of living in a state where there is adequate wilderness to experience and this area provides many canyon lands and high desert which should be set aside for this use. Secondly, I feel that there are adequate amounts of land available in the Jarbidge Resource area for grazing and other development such that the lands that do have wilderness value ought to be maintained to the maximum. There are some discrepancies in the Alternative D that I don't necessarily agree with. These include fire management and as I have already mentioned, the range resources. I feel that fire management in Alternative D wouldn't

3.1

1818 W. State Street • Boise, Idaho 83702
208-344-7799



Idaho Wellness Center

Steven L. Schneider, M.D.
Martin J. Gabica, M.D.
Family Practice

3

Jerry Carson
October 9, 1984
Page 2

3.1

necessarily have to include suppression of all fires. I know that certain fires may be beneficial to a wilderness area and were a present part of the ecological balance prior to man's intervention. I feel the fire management portion of Alternative D should be altered in such a way that fires are not necessarily suppressed throughout the area. I have no objections to the outlined plans for cultural resources, riparian habitat, and aquatic resources. I do feel that the energy in mineral exploration and development should be withdrawn from the wilderness areas themselves, however. Additionally, I have no objections to the forest management and recreation management portion of the program as outlined under Alternative C or D.

3.2

Once again, I would like to emphasize that I feel the Alternative D in the Jarbidge Resource Management Plan should be the preferred alternative rather than Alternative C because it benefits the majority of the people in the area as opposed to a minority, and would continue to do so into the future.

Sincerely,

Martin J. Gabica, M.D.

mer

1818 W. State Street • Boise, Idaho 83702
208-344-7799

P.O. Box 6235
Salt Lake City, Utah
84106

October 17, 1984

Jarbridge Area RMP Team
Bureau of Land Management
Boise District Office
Boise, Idaho

Dear Sirs:

COMMENTS ON JARBIDGE RMP/EIS - DRAFT

I read in your preferred alternative that of your resource area over 86% would be open to mineral exploration & development, over 72% would be open to unrestricted ORV use, and cow grazing would consume 170,000 to eventually 270,000 a.u.m.'s vs. a puny 3,000 to 4,000 a.u.m.'s for big-game wildlife. If this is your "balance" plan for this area, I'm glad that you are not implementing your "maximum production/consumption/destruction" plan for the area. Frankly, however, your "protection" (alt. D) and even your "no grazing" (alt. D₁) plans have more appeal.

CRAZING

The beef contribution from public land (over-) grazing is estimated at only 3% of the national total, and is far-outweighed by beef production from private land and eastern producers (97% of the nat'l total). In other words, grazing could be entirely eliminated from all public lands (U.S. Forest Service, Nat'l Parks and Nat'l Wildlife Refuges, besides the BLM lands) with little loss to the nation. Soon, other uses of the public land may become more valuable.

Maybe public land should be for our wildlife. Your 170,000-270,000 a.u.m.'s for cows and only 3,000-4,000 a.u.m.'s for big-game wildlife is a typical BLM agency-wide obscurity. May I encourage conservationists, sportsmen, tourists and primitive recreationalists all to unite in disgust against your pro-cow bias on our public land.

Should your obscene grazing fees be discussed-- they are soon up for review? Not much longer will the public tolerate your charging \$1.40 per a.u.m. while adjacent private land averages \$8.80 per a.u.m.

Most obscene are your ridiculous cost-ineffective "rangeland improvement projects," where you drill water wells, put troughs & water pipes, burn & chain sage and plant mostly exotic grass-- all with tax-payer money and at no extra cost to the ranchers running their privately-owned cows on the "improved" public land.

Instead of arguing for total elimination of cows on the public land, I would stress that cows be reduced and eliminated where ever possible. Vegetation, wildlife, watersheds, riparian and "aesthetics" would all then automatically improve. Your present emphasis on a gross increase in cow grazing is in bad taste.

WILDERNESS

You recommend only 94,000 acres, out of 209,000 acres of WSA. This is only 4% of your resource area. Would 10% of your area, or 10% of the West, or 10% of the lower-U.S. as refreshing wilderness be an unreasonable goal???

Yours disgusted, *Elliott Bernshaw* Elliott Bernshaw

within the three WSAs so that I may comment on your DEIS. I also request this letter to be made a part of my submission as a record of public comment.

5.2 | Also I have a question: Does each state's BLM formulate their own definition of what is a "road"? What leads me to this question is that Wannerwecca District in Nevada having a somewhat similar terrain finds over dozen roads in addition to ways in most WSAs but you find none?

Looking forward receiving the requested WSA maps with roads and ways information so answers for the questions posed.

Sincerely,

Harry Melts
Harry Melts
General Delivery
Port Hill, Idaho 83853

cc Mr. Ron Janson, Land Use Coordinator, Government Relations, BLM, Ohio

Mr. Gary Janson
Area Manager
BLM Jarbridge Resource Area
Boise District Office
3400 Develand av.
Boise, ID 83705

Oct. 17th '84

Dear Mr. Carlson,

Presently, I am preparing my written submission on your Draft RMP and EIS. I am troubled by the EIS team bias reporting on incorporation of ways, in a form that favors their preferred interpretive and leaving out data that may lead to a more objective view.

5.1 | Let me give some examples. Your alt. D₁ map shows only the roads and ways which you plan to characterize. You do not show the roadways your EIS team proposes to close (Map J-7). This includes the public believing that what you propose for wilderness has no manmade intrusions in form of roads or ways. Your team is using a selective reporting which is even uncommon within BLM. I invite you to look at the data and maps provided by your nearby Wannerwecca BLM Draft Wilderness EIS. Please look at their map presentation, for example page 1-55 for WSA 020-603 showing BLM roads and 19 ways in this 60,000 acre WSA regardless if they are located inside or outside the WSA's proposed Wannerwecca BLM District report's line and other Districts in other states report, you choose to report selectively. Wannerwecca District not only shows on their EIS map to the public every road and way inside the WSA, they also specify these by a letter and number. On your map this data disappears as soon as it reaches your proposed boundary. Why?

5.1 | Is there some way that Sprague River has 38 miles of ways (how much will be shown on map?) on the WSA without stating the purpose, location or reason for existence is totally inadequate background information to challenge the truthfulness of your statement on page 4-18: "Impact to ORV use. The value of their participation would be minimal to non-existent because the closed lands are for the most part unimproved and unsuitable for ORV use". I have used none of these ways in the years past with great enjoyment on many occasions. See also section Map J-7.

5.1 | Does not show the roadways on the April public hearing. From your proposed boundary in WSA 020-603 & within a rough section 34? 120 217. On your very own BLM Surface Management Map (Sheep Overlap) shows it as a substantial roadway.

In connection with the above I request copies of maps showing all roadways



United States Department of the Interior

FISH AND WILDLIFE SERVICE
ENDANGERED SPECIES PROGRAM
4620 Overland Road, Room 209
Boise, Idaho 83705

DATE: November 15, 1984
TO: District Manager, BLM, Boise District, Boise
FROM: Field Supervisor, FWS, Ecological Services, Boise
SUBJECT: Draft Resource Management Plan/Environmental Impact Statement (RMP).
Re: FWS-1-4-84-1-158

We have reviewed the August 1984 draft Resource Management Plan/Environmental Impact Statement (RMP)/(EIS) for the Jarbridge Resource Area. Previous to this, we received a draft Jarbridge RMP on December 13, 1983, which we responded to on January 13, 1984 (FWS-1-4-84-1-158). In our letter of January 13, 1984, we identified two candidate plant and two candidate raptor species. Our raptor concerns have been covered in the 1984 RMP/EIS but our plant concerns identified in the January 13, 1984, letter were not addressed. Furthermore, recent data suggests another candidate plant species should be added to the candidate list. The two plants previously identified in our January letter were *Astragalus atratus* var. *insectus* and *Lepidium davisi*. The recent addition to the candidate plant list is *Erigeron latius*. We have been unable to find any reference to the plant candidate species identified in January or the recent addition in the August, 1984, RMP/EIS.

We recommend that these sensitive plant species be a part of your planning in determining the alternative best suited for accomplishing your objectives in the current draft RMP/EIS. If you have any questions please call our endangered species office at 334-1916.

Thank you for your continued interest in the endangered species program.

Walter D. Ray
for John P. Wolfelin

NOVEMBER 15, 1984

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COMMENTS ON JARBRIDGE RMP/EIS.

1 WILDERNESS - I support your wilderness proposal for King Hill, Brunau-Sheep, and Jarbridge USA. I particularly support the plateau area included west of the Jarbridge, and I think you should look again at Brunau-Sheep to see if there is an opportunity to add some plateau acreage.

2 ACECs - I support your ACEC proposals.

3 Salmon Falls Creek Outstanding Natural Area - I support the lower canyon's designation, & propose that you also include the upper canyon in the natural area.

4 Riparian habitat/fisheries - choose Alternative D, 75 mile fencing. For riparian buffer, a minimum 500' setback should be established for each side of riparian habitat, on surface disturbance and chemical toxicants, with greater distance possible due to groundwater, soil, etc., characteristics.

5 Bighorn & sage grouse habitat improvement - Support the preferred alternative.

Good job, guys! -

Dean Littlepage

DEAN LITTLEPAGE
1501 ALPENHORN #4
ANCHORAGE AK 99507

Lawrence E. Nielsen, Ph. D.
Science Consultant and Lecturer

11

3208 N.W. Lynch Way, Redmond, Oregon 97756

November 16, 1984

Phone (503) 548-5363

Mr. Gary Carson
Bureau of Land Management
Boise District Office
3948 Development Ave.
Boise, Idaho 83705

Dear Mr. Carson:

After studying it for many hours, I would like to make some comments on the Jarbridge Resource Management Plan. The first comment is that the same thing could be said in half as many pages.

I strongly support Alternative D over the other Alternatives. In general, I do not believe any BLM land should be for sale to the general public. Exchanges of land often make sense though. Many small pieces of land, which might be up for sale or exchange, should be kept for wildlife habitat. Modern farming techniques have drastically reduced wildlife habitat. Many small pieces of BLM land surrounded by farm land if left alone would help all kinds of wildlife.

I strongly oppose any proposed land sales for agriculture development. In this day of farm surpluses, we need more farm land like a hole in the head! This land should be saved for future generations when there may be a real need for more farm land. BLM should not sell land to satisfy a greedy few.

Fewer cattle, not more cattle, should be allowed to graze on BLM land. Grazing fees should be increased to the point where the BLM actually makes a profit, even after any improvements are made. No improvements should be made unless the return from grazing fees more than pays for the improvements. Since this land belongs to all of us, we should not subsidize a few ranchers at the expense of all the rest of us. I believe that the proposed 172,493 AUMs for cattle and only 3877 AUMs for wildlife is completely unsatisfactory. Also, a reduction in the AUMs for cattle would help solve the problem of erosion.

The proposed 94199 acres for Wilderness in Alternative C is not adequate for such a scenic and unique area as the canyonslands.

I do not believe the economic figures given for the different alternatives. I believe that Alternative D would eventually bring more income into the area than the other alternatives. Alternative D could bring in more income through increased tourism, increased recreational activities such as whitewater boating and camping, and increased hunting and wildlife-watching activities.

Thank you for letting me have the opportunity of reading the report. I have not mentioned its many good points which include saving the Oregon Trail ruts and the fossil beds near Hagerman.

Very truly yours,

Lawrence Nielsen
Lawrence Nielsen

12

12

Mr. Gary Carson
Jarbridge Area Manager
Boise District Office, BLM
3948 Development Ave.
Boise, ID 83705

21.11.84.

12.1

Dear Mr. Carson,

Subject: Comments on Jarbridge Draft RMP and DEIS.

Based on my land use in the past of the Jarbridge RA my comments are as follows:

ORV Management.

Your present intentions are, as indicated by your RMP and your EIS Preferred Alternative C, to force out the motorized recreation from the more scenic areas. This is especially true for semi-primitive motorized recreation. For example your Preferred Altern. plans to close the Arch Table roadway leading to the scenic junction from the south, of the Brunau and Jarbridge Rivers (Jarbridge R. USA). The RMP in Alt. C discourages and blocks the ORV recreation to a high degree.

One suspects that the outdoor recreation planner has a high personal preference for the non-motorized and primitive only recreation. Your plans and preferences exhibit a fundamentalistic fervor in that direction. For example in your MUA 10 of its 95 000 acres you plan to close 75 000 acres to all motorized entry of which 23 000 acres are a non-wilderness area closure. Your RMP plans to designate only one tiny area specifically for ORV, only 2961 acres (MUA-9). While you prefer to designate for wilderness recreationalist 94 199 acres as WAs. Moreover, your proposal provides 144 794 acres as SRMA and only 2961 acres presents a single SRMA (the smallest) specifically for ORV enthusiasts. Moreover, if one adds up the acreage of the 16 MUAs that you in your anti ORV fervor plan to close or limit (235,650 acres to be closed 242, 498 limited) it adds up close to half a million acres; or non-significantly a third of the JARBRIDGE RA management area. To push out or severely limit ORV enthusiasts to such a record breaking extent will lead to management problems and a general disinterest towards BLM rulings.

Your closures and limitations of Big Horn Sheep MUA is to severe. Over the years I have visited the Cadesa Prieta National Wildlife Refuge, & this Big Horn Sheep Refuge has hundreds of miles of primitive roadways open for semi-primitive motorized recreation. The Refuge staff indicated to me in their conversation that future plans will recommend the opening of additional roadways for ORV. (Based on personal contact in 1983 & 1984). Same situation prevails in Kootenai Refuge, AD. I urge your staff to upgrade their protection management knowledge by contacting these large refuges.

Your RMP/DEIS map and text are incomplete. On your DEIS maps all roadways are shown as closed as soon as they reach your Preferred Alternative boundary. This is wrong. The correct way with a PRMA positive impression is to the proposed wilderness area naturalization. Your maps show only the total miles of roadways in a SRMA. No indication where they are located. The purpose, use, frequency etc. of the roadways is also ignored. This omission is even more serious since BLM in 1977 published a Surface Management map, scale 1:100 000 showing all the existing roadways. Why did not use this map of this or similar and technical Sheep Creek EIS map sheet? Do not show any ORV roads on the T148 RBE through sections 17, 20, 29, 34. Section 17 is 3 hours by road. 34, Or T153 RBE from sec. 17 to 34. Or T158 RBE through sections 2, 10, 13 and 30. What makes this omission of a road log even more objectionable by your team's missed opportunity in that other BLM Districts to present all roadway data and their maps in their RMP/DEIS show all these. For example look at the level of detail by a log along by BLM District, Elko District Nevada. Their Mills Resource and Report Maps for Livestock and Watersheds for each USA not only show all roadways and roads but also the road number for each road. Bonanza PLM District shows all 30 ways. For the public to comment on all roadways and status at using these 30 miles are essential.

12.2

Specific comments on MUA.

MUA 111-17 Jarbridge R/Sheep Cr.
I support the Preferred Altern C with the following exceptions:
Move the S boundary of the proposed MUA northwards from that 22 423 to about section line 22/15. It will give the ORV visitor an opportunity at least to see the a great view of the total canyon bottom of Brunau R. Additionally, every mile a highway to the wilderness which enters at a S. It also suggests a ORV access from Miller Lake table to Brunau R. Runway. I believe in a canyon, your team's proposal will allow even a small part of the lower canyon for ORV use since in this wildlife refuge was written.

MUA 170 11 Jarbridge R.

I support the Preferred Altern C. But the S boundary of the wilderness for about 1/2 mile to 2 miles on the Jarbridge and a Stock Bridge. Your Preferred Alternative C is not 1/2 mile off east of the Jarbridge. It is the Lookout Point in sec. 9 2285. The plan in this canyon, the only road to the Jarbridge. Definitely leave open the road to the Jarbridge. Use 17 RBE T148. The plan should not be a wilderness. It should allow for other resource users.

King Hill

I support the wilderness plan for the King Hill area. Its wilderness protection is a serious wildlife management area.

Sincerely,

Henry Miller
Henry Miller
P.O. Box 34
Postville, ID 83853

Hells Creek, Wyo. Zimark Probers
George Wells Attorney - Loan Officer
Written Deposition
K-5-84

13

Address - Route 2, Badd, Idaho

The producers very fairly and I am concerned about several aspects of proposals presented in the Jarbidge Management Plan and Impact Statement dated August 1984. We appreciate the intent to preserve Jarbidge in a natural state for future generations. It is obvious that whether water goes together or home for recreation purposes which has had to come through the years and eventually transform a National Game Preserve into a wilderness area on the various habitats that above the population imbalance which naturally occurs at different times. This impact statement places a serious burden of fault on the sheep, cattle, and horse producers of the area. In my opinion if one were to eliminate the range restrictions would some of these domestic animals be eliminated from the area. The Buffalo and other game animals were a necessary part of this eco-system. I have heard stories from some nearby settlers about the damage as to roads done by the Buffalo in heavy concentration in preferred areas.

A great concern to me is the intent to isolate and divide primitive the river channel of the full length of the Brunner river. The proposed fencing and the necessary amounts to provide water away from the river is in my estimation in need of further consideration. I feel that the proposed benefits to the riparian habitat are threatened and ineffectual. Long range water projects intended to be made before you plan are implemented. The first goal for all users and owners will be raised with the wilderness. The animal damage issue is a serious one for both domestic and wild animal populations. I feel that historical practices affect its control. Riparian animals have been away, conservation and sensitive effort. These efforts have been drastically hindered from every

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single be extended input from persons unfamiliar with the various intricacies.

Success of proposed range is not consistent in its plan. I do not see definite goals or guidelines which address variations in water availability to livestock, and seasonal grazing values. Consideration of making these management plans useful for year around utilization and maximum value to stockmen as well as the sportmen.

Economic valuation of the lands should be more fully developed to include the money hidden expense to the user which are unique from those seen on irrigated pasture. Weather range variations from year to year and season to season is one example and another is losses of livestock which far exceed those of irrigated pasture. The basis include valuation, success, production, and income limited necessities.

The wilderness designation in part of areas to be a livestock area or a pasture. We have seen the results of the effort on the less viable pastures. The wealthy, idle or retired are able to strike these properties. I realize that the number of farms in these classifications are growing rapidly. I agree this movement and appreciation of this wonderful contribution that portion of the population.

I feel that the riparian grazing systems have greatly improved. The Federal Range Land Management effort to develop the various riparian lands within these allotments can maximize production and improve the heritage of future generations. We must realize though that what we wish for these people may not be what they will desire no matter how sincere our efforts may be.

George Wells -

Dec 6, 1985.

15

FIRST, yes I would like a copy of your proposed wilderness plan for Jarbidge and surrounding areas.

I also have some comments and questions.

1. Why? It's really in the best interest of the owners of the land. (w/ the people.)
2. Why? Do the Federal Agencies (BLM & USFS) seem to think that the public land should be restricted to a very small percentage of the population. If you don't want to walk and don't own a horse you can't use your land.
3. I don't want to see the land destroyed, but I think going to a wilderness designation is going to FAR.

4. I agree there are certain areas that need protection. Such as the Angerman Fossil beds, but only the Fossil beds NOT the area for miles around.

5. When you close large amounts of land to the public, this increases use and wear and tear on other areas because of increased pressure.
6. I would rather see in certain areas what I would call a NO CHANGE STATUS on these areas the owners (the public) would still be able to drive vehicles, ride motorcycles, hunt, do rock collecting and generally enjoy the area, but no new development would be allowed to take place.

15

5. ONE FINAL comment, which is A question asked of the B.L.M. in CALIFORNIA when they were trying to close the desert there.

6. Why do you want to save the Land For future generations? So they can't use it either.

Thank you.

Stan Mai
RT #2
Filer Idaho
83328

We, as members of the Owyhee Gem and Mineral Society, Caldwell, Idaho, wish to go on record supporting the No Wilderness/No Action Alternative of the Bruneau River-Jarbridge River Wilderness studies.

Being that wilderness designation of such public lands prevents or severely limits motorized vehicle access to those regions,

And being that, in order to successfully collect and preserve gems, minerals and fossils on public lands, local rockhounds need to have adequate vehicle access to their rock collecting sites,

And being that, the nationally famous Bruneau Jasper deposits are included within the BLM Bruneau River-Jarbridge River Wilderness proposals,

And being that, wilderness designation of these areas will put stricter controls and limitations on the future mining of this unique form of jasper.

And being that, these extra restrictions will make the mining of this jasper more expensive,

And being that, these extra mining costs will be passed on to the buyer (including the rockhound customer) of this high quality, one-of-a-kind variety of jasper,

We do not feel that those areas located within the Bruneau River-Jarbridge River Wilderness studies should be designated as wilderness. We believe that multiple-use management of those areas is the best alternative for rockhounds and for the public in general.

NAME	ADDRESS
John J. Brown	2719 Shamrock Nampa Idaho
Alvin J. Brown	2570 So Locust St. Nampa Idaho
Lynne B. Babbitt	2010 So Locust St. Nampa Idaho
Ray W. Bailey	116 W. Boone Nampa Idaho
Eric W. Bailey	412 W. Boone Nampa Idaho
Bill Mundy	1112 Jordan St. Nampa Idaho
Timothy Mundy	1112 Boone N. Nampa Idaho
Ray W. Bailey	1112 Boone N. Nampa Idaho
Timothy Mundy	1112 Boone N. Nampa Idaho
Walter Brown	317 Chicago St. Caldwell Id.
Maryanne Justice	RT #1 Box 1419 Nampa Id.
Donald Campbell	523 Sunset Nampa Id. 83651
Esther M. Rogers	RT 7-Box 70950 Nampa Id. 83651
Randa Kincaid	RT 8 Box 117 Caldwell, Id. 83605
Annex Stranger	1812 W. Orchard Nampa ID 83651

W.D. Stringer	1812 W. Orchard Nampa Id. 83651
J.M. Pennington	439 Caldwell Blvd. 11 Nampa Id. 83651
John D. Little	RT 1 Box 1419 Nampa Id. 83651
Darlene G. Gray	719 Opal, Boise Idaho 83705
Howard T. Emby	719 Opal, Boise Idaho 83705
Charles Bryant	2020 S. MICHIGAN RD. CALDWELL ID 83605
Nesta L. Emby	1230 Alder St. Caldwell Id. 83605
Ray Romney	1720 Alder St. Caldwell Id. 83605
Earl Whitefield	1523 S. Oak St. Caldwell Id. 83605
Harvey Nelson	815 Albany Caldwell Id. 83605
John Johnson	230 W. Georgetown Caldwell Id. 83605
Margaret Harbor	1609 Remond St. Nampa Id. 83651
John W. Harlow	1809 Lower Lane Nampa Id. 83651
Paul D. Hays	223 E. 5th St. Caldwell Id. 83605
John Hays	16 B. 6839 4th St. Nampa Id. 83651
Ann Johnson	216 E. 6th St. Nampa Id. 83651
Mary J. Johnson	220 W. 2nd St. Caldwell Id. 83605
John Hill	420 Washington Ave. Nampa
Robert A. Smith	420 Washington Ave. Nampa
Les R. Nelson	204 N. 5th St. Nampa Id. 83651
Alan Wood	1909 Alpine Caldwell Id. 83605
Levi Cassidy	RT #4 Nampa Id.
Cliff Cassidy	R #4- Nampa Id.
John L. Campbell	1114 W. Orchard Nampa Id. 83651
Des W. Cuntler	284. Box 4450 Nampa Id. 83651
Marjorie Pennington	R. 2 Box 4450 Nampa Id. 83651
Byron L. Elliot	RT 3 Box 3780 Nampa Idaho 83651
Harry W. Ellis	1114 W. Orchard Nampa Id. 83651
John W. Nelson	212 2nd St. Nampa Id. 83651
John Nelson	419 Diamond St. Nampa Id. 83651
John Nelson	419 Diamond St. Nampa Id. 83651
John Nelson	419 Diamond St. Nampa Id. 83651



United States Department of the Interior

GEOLOGICAL SURVEY
RESTON, VA. 22092

In Reply Refer To:
MGS-Mail Stop 423

DEC 3 1982

Memorandum

To: District Office, Bureau of Land Management
Boise, Idaho

From: Assistant Director for Engineering Geology

Subject: Review of resource management plan and draft environmental statement for Jarbridge Resource Management Plan, Idaho

We have reviewed the subject document and have the following comments on the environmental statement.

Page v, Alternative C, paragraph 3. The summary should state that increased erosion also increases sedimentation in streams. Because increased grazing increases sedimentation and overland runoff, less water is available to recharge aquifers.

Part II, pages v, and 3-5. Increased grazing (as described for Alternative C) could cause changes in the complex interaction of surface water and ground water even though the vegetative land cover will be managed. Vegetative land cover may prevent erosion, but increased grazing can increase compaction and reduce infiltration rates. Increased grazing might also degrade water quality with concentrations of coliform bacteria. These are potential consequences that should be addressed in Chapter 4, page 4-43.

Chapter 4, page 4-42, paragraph 2. If the use of chemical fertilizers will accompany increased acreage of farmland, resultant effects on water quality should be addressed.

Chapter 4, page 4-16, table 4-3. The U.S. Geological Survey report, "Water Resources Data-Idaho 1982," lists a record minimum daily flow of 4,760 cfs in 1910. The minimum daily flow in water year (WY) 1981 was 5,610 cfs on June 28, 1981, and the minimum daily flow in WY 1982 was 6,820 cfs on July 24, 1982. It would be useful to include a flow-duration curve to show the percent of time recorded flows have been equal or exceeded for the period of gaged record on the Snake River at King Hill (13154500).

18.1



United States
Department of
Agriculture

Soil
Conservation
Service

Room 345, 304 North 8th Street
Boise, Idaho 83702

District Office, Bureau of Land Management, Boise, Idaho

2

Considering anticipated amounts of water needed for irrigation (p. 4-42), flow in the Snake River will occasionally be less than the flows listed on page 4-16 (par. 2). Thus the third sentence of the second paragraph on page 4-16 needs to be revised.

James F. Devine
James F. Devine

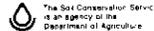
December 13, 1984

Gary Carson
Jarblidge Area Manager
Boise District Office
Bureau of Land Management
3948 Development Avenue
Boise, Idaho 83705

Dear Mr. Carson:

Following are our comments on the Jarblidge RMP/EIS. We want to compliment the BLM on the way they broke the area in management unit areas (MUA's). This made it much easier to review than previous EIS documents.

1. Pg. 8, par. 4 - Twenty Coordinated Resource Management Plans (CRMP) would be implemented under the preferred alternative. Nowhere could we find them identified. In the specific section (pages 20-63) for each MUA, Action G, the activity plans are listed as AMP, RAMP, cultural plans, etc., but no CRMP's. It would be useful if those selected for CRMP's were identified.
2. Pg. 61, Action G - Allotment 1021 is listed for an AMP. This is the Buck Creek Ranch with Bob Barton as the permittee. A CRMP with Nevada SCS as the leader, is nearly completed which involves this allotment. This should be a CRMP.
3. Pg. 8, par. 6 - There will be an increase in AUM's from the current 164,000 to 271,611 or 107,611 AUM's. Most of the increase is from seedings. Pages 4-45, par. 2 states 15,538 AUM's will be lost through land transfer. This means that range improvements, better animal distribution, etc., will actually have to provide an additional 125,169 AUM's. There is a lot of unused forage in MUA's 6 and 7, Saylor Creek West and East, where much of the increase will occur, but according to Appendix Table F-2, over 50% of the area is either poor condition or burned. The potential is limited; the majority of MUA's 6 and 7 receive only 8-10 inches of annual precipitation. Grazing needs to be carefully controlled.
4. Pg. 4-44, Par. 4 - Long-term impacts will increase forage by 108,000 AUM's. Of this 57,021 AUM's will be from animal distribution and improvements; 10,000 from land treatment; and 22,735 from fire rehabilitation. This totals 89,756 AUM's. Where will the additional AUM's come from to make 108,000 plus those to be replaced due to land transfer?



The Soil Conservation Service
is an Agency of the
Department of Agriculture

Gary Carson
December 13, 1984
Page 2

5. Pg. 4-44, par. 6 - Long-term improvement in ecological condition is expected in MUA's 2, 14, 15, and 16 on 40,000 acres. Table F-2, page F-7, shows approximately 953,000 acres in poor and fair condition. It would appear there is a much greater opportunity to improve ecological conditions than on just 40,000 acres. In the long-term this would enable the BLM to provide more forage for livestock, provide better site protection, and enhance wildlife habitat.
6. Referencing comments 3-5, we feel BLM is expecting too much increase in AUM's from the proposed improvements.

Stanley N. Hobson
Stanley N. Hobson
State Conservationist

cc:
Joe Icehower, AC, Boise AO

P. O. Box 1587
Ketchum, Idaho 83340

December 15, 1984

BLM
3948 Development Way
Boise, ID 83705

FOR THE HEARING RECORD
JARBLIDGE RESOURCE AREA

Sentlemen:

After following newspaper reports on meetings with ranchers and livestock groups in areas involving the above, I question their opposition to Wilderness Designation for the Jarblidge Area. Although I appreciate their personal views, I also realize that they are not thinking about the future, preservation of valuable lands to be left in their natural state for generations to come.

Wildlife and its habitat are of great value to the State and all its people. During a time when we have over production of grains and livestock, farm subsidies for non-production, and a questionable water supply if the Snake is going to be tapped further, and as long as we import beef from South America, lamb from Australia and New Zealand, why destroy wildlife habitat and natural growth to produce even more grain and livestock?

Thank you for your attention.

Sincerely,

Hildegard Raebler

Hildegard Raebler

24 Dec 16th

Dear BLM Personnel-

I would like to comment on the BLM Management Plan for the Jarbidge Resource Area. As a former Owyhee County resident I feel my input is both knowledgeable about the country and also important to you. I am a school teacher who lived and explored the Three Creeks area for two years; and so I feel I "know" the "lay of the land" and its potential problems and balances.

I am not a rancher or developer so I don't have any economic interests to sway my opinions in that way. That country is wonderfully wild and relatively

24 (2)

"un managed". I feel the priority should be on keeping it as wild and free and open as we can. That means I do not favor

- 1) the over emphasis of domestic cattle grazing at the expense of wildlife. The wildlife was there first and that should be our priority. Not economic gains via beef raising
- 2) New irrigated grazing land that will take additional water out of the Snake R. Aquifer.
- 3) any sale of our public lands to individuals. We need to retain our BLM land in large tracts.

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Such as this one. The developers can look elsewhere for cropland and the ranchers (some of my best friends) need to be content with their current grazing allotments.

I am in favor of the wilderness designation of at least 200,000 acres plus, land especially designated for wild horses. We need to keep the land + wildlife in mind as 1st priority and what is best for them.

Morally you all know that is best.

Sincerely
Susan Wood Ray
PO Box 491
Hazenman, Id 83332

BLM
Buse, Idaho

25

Dear Sirs:

I certainly do not want our BLM lands turned into farmland. We are already in a state of over production. We certainly do not need anymore houses built in our forests and desert and I see no need for businesses to build on our excellent farmland. Then farmers go out in the rocks on very poor ground to start another farm.

Also our wilderness is being overgrazed & our wildlife does not have anyplace to live. Our sagebrush is being destroyed by stockmen. It's ridiculous

these are the fences that ²⁵ destroyed our sage grouse habitat. Everyone knows the winter feed isn't there for our elk and deer. I certainly want our Brunson River Wild and Scenic, we do not need anymore dams etc. We need more feed for our wildlife not cattle & sheep. If ranchers want animals let them keep them in their ranches, many do. Let the wildflowers, sagebrush and native grasses grow.

Sincerely
 Bernie Walker
 Shane Walker

SUNFLOWER

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A Note from the Desk of

R. W. Stapp, D.V.M.

C. J. Stapp, D.V.M.

Gooding, Idaho 83330
 (208) 934-4481



THE LIBERATED COW

The Ice Storm
 Boise District 12/11
 3044 222 1/2
 Boise Idaho
 Boise ID 83702
 I am in process
 of not including J. 100
 agreement to those interested with respect
 also as a matter of fact
 within 15-20 minutes I
 am the good old grazing
 and had 20 years of experience
 Dept of Interior
 Have a Nice Day Until Some Bastard Louies it Up

26

I pay several times as much for private pasture than is charged by the govt for public range (mg)

Thank you for reading this
 Yours truly,

C. Stapp



COMMITTEE FOR IDAHO'S
 HIGH DESERT 26
 P.O. BOX 463 BOISE IDAHO 83701

DESERT ALERT

The Bureau of Land Management (BLM) has recently released a Resource Management Plan (Environmental Impact Statement) for the Jarbridge and Medicine Lodge Resource Areas. Comments for Medicine Lodge are due at Christmas.

The Jarbridge

The Brunson-Jarbridge River flows north out of Nevada through the region south of Mountain Home and west of Twin Falls. It is a system of spectacular (rock-walled) canyons up to 120 feet deep. It is home to big horn sheep, pronghorn antelope, bobcat, cougar, mule deer, more deer than bison, golden eagle, red-tailed hawk, and red-breasted nuthatch. It provides excellent wildlife habitat a couple hours drive west of southern Idaho. Unfortunately, its future is in danger.

The Bureau of Land Management (BLM) has released the draft Jarbridge Resource Management Plan and Environmental Impact Statement (RMP/EIS). This document outlines alternatives for managing 1,890,473 acres of public land in the Jarbridge Resource Area.

Decisions based on this document will guide BLM actions for the next 20 years and beyond. Just as a matter of fact, decisions under the BLM proposed action. Everyone should take the opportunity now to write the BLM before the January 2 deadline.

JARBRIDGE-BRUNSON WILDERNESS: The canyon steep from redish brown to brownish gold with chert blocks and columns. The Brunson Canyon boasts some of the most massive canyon hoodoos in Idaho and the Jarbridge is equally impressive and is nationally known for its spectacular. Back from the top, sagebrush and grass extend on into a unique rangeland landscape.

The BLM is recommending 180 miles of public lands for a riparian wilderness. All the plains west of the Jarbridge. This is 18 per cent of the 370,000 rangeland acres in the area. Conservationists familiar with the area believe a 340,000-acre wilderness incorporating the riparian would protect the Jarbridge.

SENECA HILL WILDERNESS: The King Hill wilderness in the Brunson Hills is part of the Canal Trail. It provides elk winter habitat and a diversity of habitats on 20,200 acres. BLM is recommending wilderness and CHD under this recommendation as part of a larger Canal Trail-Brunson Hill wilderness.

and comments for Jarbridge are due next after New Year's. Because this is a particularly critical time of year, your comment letter is especially needed. Please take a few minutes and respond to these two critical issues.

WILDERNESS: Wilderness users grow up under the Jarbridge RMP. The BLM is recommending only 67,000 acres of the Brunson-Jarbridge-Sheep Creek complex for wilderness. This represents only 11.2 per cent of the Wilderness Study Area. The 114,000 acres excluded from wilderness protection includes all the plains on the Brunson River and Sheep Creek and all the plains on the east side of the Jarbridge River.

Riparian wilderness for the Brunson and Sheep Creek will exclude the fall deer shrub ecosystem from representation in Brunson Wilderness. The riparian is one of the most diverse ecosystems in Wilderness Study Areas. If the controversial Jack Creek WSA fails to become wilderness, that means a representative of the ash deer shrub ecosystem will make it into the national preservation system.

LAND TRANSFERS: CHD questions the BLM plan to transfer 1,444 acres of public domain in the Jarbridge RA to private ownership. While some exchange and sale may be beneficial, CHD is concerned that the BLM should allow 4,581 acres of public domain to remain in public ownership. The ecological impacts will be substantial. These are deep lands with complex soil structure and will crowd riparian grasses into smaller ranges, thus fragmenting wildlife habitat. Water resources will be increased further in southern Idaho as more of the riparian water will be pumped out of the Snake River. Other electric companies will be required to subsidize pumping costs to the tune of \$2.4 million per year.

ALTERNATIVES: The BLM offers five alternatives in the EIS. These range from (A) continuing present management, to (B) drastically increasing production or exploitation of the Resource Area, to (C) the preferred BLM alternative, to (D) managing for production and maintenance of the resource values. CHD is proposing a 340,000-acre alternative proposal.

Action

1. Support the conservationists' 340,000-acre wilderness proposal for the Brunson-Jarbridge and the surrounding Brunson. They should be preserved for future generations.
2. Support wilderness for King Hill.
3. Urge increased numbers of CHD's instead of more cattle and/or agricultural development. Show concern about soil erosion and soil plant and animal production. Urge protection of all habitats sheep habitat including Salmon Falls Creek and the East Fork of the Jarbridge.
4. Support Wild and Scenic River status for the Brunson Jarbridge and Sheep Creek. Mention the East Fork of the Jarbridge, which forms a link to an unbroken wilderness river ecosystem that extends from headwaters in Nevada's Jarbridge Wilderness to the Snake River.
5. Mention any personal knowledge you have of the area. People who have been to these areas form a small but credible group engaged in an activity of discovery.
6. Support the proposal to represent elk into the Jarbridge country.

A massive outpouring of letters is needed to show that we care what happens to the Brunson Jarbridge and King Hill areas.

Send your comments to:
 Mr. Joe Zimmerman, Manager
 Boise District, BLM
 2045 Development Avenue
 Boise, Idaho 83720
 Thanks for your help!



12/16/84

30

12-19-84

28

SIR:

PLEASE KEEP THE BRUNEAU RIVER WILD! IDAHO, OR AMERICA FOR THAT MATTER, DOES NOT NEED MORE COWS OR LAND DEVELOPMENT. WHAT WE NEED IS MORE OF OUR REMAINING ~~AND~~ UNDEVELOPED WILDERNESS KEPT THAT WAY — AWAY FROM COWS, FARMERS, AND HOUSING DEVELOPMENT. AGAIN

PLEASE KEEP THE JARBIDGE RESOURCE AREA IN TACT. DO NOT GIVE WAY TO THE SALE OF EVEN ONE ACRE.

Reynolds & included

Elaine Fairchild
1750 Member
Burley, ID 83816

Dear Mr. Zimmer,

I am writing concerning the Jarbridge Resource area. I've spent a fair amount of time in the Jarbridge area, & being a native of Hooding, have spent a lot of time in the Bennett Hills - King Hill area.

I find the natural life & beauty of the area unsurpassed in its own way.

I definitely support the conservationists' 340,000 acre wilderness proposal. Please lets save it for future generations - We are stewards - lets act like it!

I especially support wilderness for the Bennett Hills King Hill area. Its a very unusual & special area. I'd be glad at almost anytime to take you around to see the petroglyphs in the area. Thank you, *Elaine Young*

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ELLEN TRUEBLOOD
719 SOUTH AVENUE SOUTH
NANPA, IDAHO 83651
December 20, 1984

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Mr. Joe Zimmer, Manager
Boise District, BLM
1948 Development Avenue
Boise, Idaho 83705

Dear Mr. Zimmer:

Please enter this letter as my testimony on the LIS on Draft Jarbridge Resource Management Plan.

I support the conservationists' 340,000-acre wilderness proposal for the Bruneau-Jarbridge and the surrounding plateaus.

I also support wilderness for King Hill WSA.

Protect all bighorn sheep habitat including Salmon Falls Creek and the East Fork of the Jarbridge river.

I support increased numbers of wildlife instead of more cattle or more agricultural development.

Wild and scenic river status should be given the Bruneau-Jarbridge rivers and Sheep Creek. The East Fork of the Jarbridge forms a link in an unbroken wilderness river ecosystem that extends from the headwaters in Nevada's Jarbridge Wilderness to the Snake River.

The proposal of Nevada's game officials that elk should be reintroduced into the Jarbridge country should be supported.

The Snake River Riparian Plan deserves protection for its habitat for white sturgeon, water fowl, upland game, mule deer plus the Oregon National Historic Trail at Three Island Crossing State Park.

Protect Snake River Birds of Prey, the Bruneau Sand Dunes State Park and important wetland/riparian areas along C.J. Strike reservoir.

Paleontological sites including Sand Point, Hagerman Fossil Beds and others should be given full protection through designation of ACEC and the BLM management prescription for NUA-9.

Protection of soils in high to very high erosion hazard classes is very important. Livestock grazing is among the most common erosion causes. Livestock use should be decreased in these areas.

ps.

And please don't log the lumber off the Bennett

This is a high desert area - not a rain forest - These trees took an incredible long time to make it there & won't come back so very easily.

T. Reals

Page 2
L. Trueblood
Bruneau-Jarbridge

31

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Transfer of public lands to private ownership has accelerated erosion of soils where rangeland has been converted to agricultural production. Further transfer should be limited. We question the wisdom of allowing 74,561 acres of public land to become available for desert entry development.

Water resources in southwest Idaho would be stressed further and electric ratepayers would be required to subsidize pumping costs.

ORV use contributes to accelerated soil movement and the use of these vehicles should be limited to trails on any unit or prohibited.

Respectfully submitted,

Ellen Trueblood
Mrs. Ellen Trueblood

Comment letter 37 submitted by Gerald Tews is substantially the same as comment letter 99. See comment letter 99.

34

BRUCE BOWLER
LAWYER
1111 Shaw Min. Road
BOISE, IDAHO 83712
Phone 342-0352
December 19, 1984

Martin J. Zimmer
District Manager
Boise District
Bureau of Land Management
3948 Development Avenue
Boise, Idaho 83705

Re: Draft Jarbridge Resource Management Plan and Environmental Impact Statement, August 1984

Dear Manager Zimmer:

I appreciate your supplying to me a copy of your Jarbridge Statement dated August 1984 and opportunity for comment thereon. I have personal familiarity with most of the lands in the Jarbridge Resource Area from many years of hunting, fishing, and hiking.

I support the conservationist's 340,000 acre wilderness proposal for the Bruneau-Jarbridge Area. I commend your recommendation for wilderness for the King Hill and Bennett Hills part of the Camas Trail. The Hagerman fossil beds also deserve better protection. Also, the unique Bruneau Dunes need protective administration.

You document lots of public resource values, but your goals continue to accommodate the cattle industries at the expense of wildlife which is the more important public asset. Your thrust needs to be to substantially reduce cattle grazing on these public lands.

I have examined the comments made by Bill Meiners, Chairman of the Natural Resources Committee of the Idaho Wildlife Federation, and wish to be counted in complete agreement with the comments made by Bill Meiners for the Idaho Wildlife Federation. Your best guide could be to follow his comments.

We have already gone far too far in accommodating cattle grazing on these public lands.

Thank you kindly.

Very truly yours,

Bruce Bowler
Bruce Bowler

BB/kmk

5-32



Wildlife Management Institute

Suite 725, 1101 14th Street, N.W., Washington, D.C. 20005 • 202/371-1808

DANIEL A. POOLE
President
J. S. LAHN
Vice President
J. L. WILLIAMSON
Secretary
WESLEY M. DIXON, Jr.
Board Chairman

December 18, 1984

Mr. Gary Carson
Jarbridge Area Manager
Boise District Office
Bureau of Land Management
3948 Development Avenue
Boise, Idaho 83705

Dear Mr. Carson:

The Wildlife Management Institute is pleased to comment on DRAFT JARBRIDGE RESOURCE MANAGEMENT PLAN and ENVIRONMENTAL IMPACT STATEMENT, Idaho.

The plan and EIS are the best we have seen from BLM in some time. The wildlife portions are explicit and easy to find, and the effects are well described. The area guidelines are good. We are impressed with the use of "multiple use areas" to present and evaluate site specific portions of the document.

In general we prefer Alternative D, protection of noncommodity resources. We urge adoption of maximum wilderness. Only 12 percent of the 1.69 million acres of the Jarbridge area are in wilderness study areas, and commodity uses would be little impacted by wilderness classification. The long-term values of the Snake River valley would benefit from wilderness.

Our principal objection to the plan is the proposal to classify 74,561 acres for agricultural entry. These lands are some of the most productive on the area, and their conversion will impact adversely almost all wildlife, especially deer, sage grouse, raptors, curlew and nongame species.

Although conversion of these lands to agriculture will benefit Idaho's economy, it will reduce the economy of other states almost as much as Idaho gains. (Page 4-54) The potential wildlife losses are not worth this small national gain.

The wildlife population figures from the five year Idaho Fish and Game plan are probably met. However, the Idaho figures should be included in a comparison chart with BLM figures.

The prevention of grazing by domestic sheep within one mile of high range is commendable, but we believe that one mile is too close. Strays of either species could spread the diseases that are the problem. Five miles would be a much more realistic figure.

The sections on riparian management are detailed, specific and provide the fencing needed to achieve the objectives.

The master charts of effects and the pie charts are easy to read and are a great aid in understanding the plan.

The plan should provide substantial improvement for sage grouse, but little improvement is projected.

The economics of range improvement show another heavy subsidy to the permittees. This is calculated from the data presented on page 4-45:

Cost of range improvement	\$ 2,400,000
20 year increase in AUM	\$ 127,000
Average cost per AUM	\$ 18.90
Annual interest per AUM @ 8%	\$ 1.52
1984 Grazing fee	\$ 1.37
Direct subsidy of \$2.4 million in range improvements to 86 permittees = \$27,906 each	

Capital value increase of 127,000 AUM's:

Minimum \$7.2 million or \$83,720 per permittee
Maximum \$11.8 million or \$136,767 per permittee

Obviously the Administration's hair and budget tightening has not yet reached these 86 permittees.

Some specific comments follow:

PLAN

Page 71. Resource management guidelines in general areas are as good or better than any we have seen in BLM.

Page 79. Proposed range improvements should be shown on a map, or at least for a projected general area.

Page 80, Terrestrial wildlife, last paragraph. What are the forage-cover ratios that will be incorporated in the plan?

EIS

Page 2-36 - Sage grouse. This listing indicates static or worsening conditions for Sage grouse. The goal should be improvement.

Page 3-8 - Terrestrial wildlife. These descriptions and tables are very good.

1303 Ivy Rd #12
Bremerton, WA 98310
December 21, 1984

Mr. Gary Carson
Jarbridge Area Manager
Boise District BLM
3945 Development Ave
Boise, ID 83705

Dear Mr. Carson:

Although I currently live in Washington, I grew up in Idaho and care very deeply about Idaho's resource management decisions. I wish to make a few comments concerning the Jarbridge Management Plan and Environmental Impact Statement.

I urge you to support the designation of 340,000 acres in the Jarbridge as wilderness, especially the plateau lands on the east side of the Jarbridge River. This plateau is one of the few remaining representatives of the salt desert shrub ecosystem. I approve of your recommendation of 29,209 acre King Hill wilderness. In addition, the Bruneau-Jarbridge River Canyon and Sheep Creek deserves inclusion in the Wild and Scenic River System. My first desert backpack was to the Bruneau River - the scenery was spectacular, the solitude engrossing and the plateau and canyons intriguingly endless. Wilderness designation will protect wildlife habitat which is especially crucial for endangered and sensitive species (bighorn sheep, raptors, sturgeon, river otters and red-band trout).

More AUM's must be allocated to wildlife if viable populations are going to be maintained. All bighorn sheep habitat must be protected (Sheep Creek, Salmon Falls Creek and the West Fork of the Jarbridge). I approve of the plan to reintroduce elk to the Jarbridge Mountains.

I spent several months on the Jarbridge Resource Area conducting plant surveys and recall surveying acres of overgrazed public land. Grazing must be properly managed and even curtailed in some areas if the land is going to recover.

Regarding your proposal to transfer 74,561 acres to agricultural development, the impacts on wildlife, livestock grazers, power rates, and water resources would be substantial. The costs of these transfers far outweigh their benefits.

In summary, I support CIBP's 340,000 acre wilderness proposal for the Jarbridge, more emphasis on wildlife needs in your management plan, wild and scenic river status for the Bruneau-Jarbridge, Sheep Creek and the West Fork of the Jarbridge and elk in the Jarbridge Mountains.

Thank you for this opportunity to help plan for the future of Jarbridge Country.

Jill Wyatt
Jill Wyatt

Pages 4-5, 4-6, 4-7, 4-8. The pie charts are good and show relatively little difference in habitat class of several wildlife species at the end of 20 years. This demonstrates our concern that large expenditures for range improvement, plus disposal of agriculture lands, are to benefit only the agriculture interests, with a little bit left over for wildlife.

Page D-1. Who will do the monitoring? The Idaho Fish and Game Department should be involved.

F-1. An unspecified amount of the 20 year increase in livestock AUMs is from "Improved Distribution". This could be detrimental to wildlife, because it moves cattle into presently ungrazed areas that are valuable for wildlife. This should be discussed and reconsidered.

These remarks have been coordinated with William B. Morse, the Institute's Western Representative.

Sincerely,

Daniel A. Poole
President

DAF:msm

CHRIS MAZZOLA, D.D.S.

Dear Sirs,

I am against increased grazing & hydroelectric development on the Bruneau River and adjacent lands.

I feel the Bruneau River should be kept a Wild and Scenic River System.

Thank you

Chris Mazzola



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P.O. Box 27F
Lakewood, Colorado 80227
(303) 987-6200
TWA 910 320 2934

December 5, 1984

Mr. Gary Carson, Jarbidge Area Manager
Boise District Office BLM
3948 Development Avenue
Boise, Idaho 83705

Re: Draft Jarbidge Resource Management Plan and Environmental Impact Statement, August, 1984

Dear Mr. Carson:

We have reviewed the Draft Jarbidge Resource Management Plan and Environmental Impact Statement, August, 1984 and compliment you on the thoroughness of the report. We were particularly pleased to find the excellent set of maps which greatly facilitated our review. On behalf of the Minerals Exploration Coalition, we at Tenneco Minerals support the BLM in its efforts to formulate management plans and hope the following comments will be useful.

The issue of mineral potential is addressed in the report, and although this is a welcome and commendable effort not seen in some other EIS reports, we feel that much is being overlooked. When we apply our considerable experience in mineral exploration in the western U.S. to the evaluation of the mineral potential of the Jarbidge Resource Area, we find considerable encouragement. We feel that the BLM has placed too much emphasis on the scarcity of surface occurrences of economic minerals and not enough on conceptual reasoning. We would point out that many ore deposits around the world have been discovered beneath barren surface exposures. Obviously all of the outcropping ore bodies in the U.S. have already been found and mined, however new deposits continue to be found every year. The key to discovering these buried or blind deposits lies in the ability to recognize subtle geologic features that are known to be associated with ore deposits, even though the ore deposits themselves are not exposed. This is exactly our evaluation of the rock group known as the Idavada Volcanics which occur over vast areas of the Jarbidge Resource Area, including the Bruneau River-Sheep Creek and the Jarbidge River Wilderness Study Areas. Therefore we support ALTERNATIVE A, the "no action" alternative. We feel that it is important to keep this ground open for future mineral exploration because it does offer good discovery potential. Our geologic reasoning for this recommendation is further developed below.

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Mr. Gary Carson
Page 2

December 5, 1984

The favorability of the Idavada Volcanics for economic mineral deposits is not recognized in the available geologic reports on this part of Idaho. It is not mentioned in either of the two GEM Resource Area reports (1983) or a key geologic report by Bennett (1976, Reconnaissance Geology and Geochemistry of the South Mountain - Juniper Mountain Region, Owyhee Co., Idaho; Idaho Bur. Mines & Geol., Pamphlet No. 166). However, Bennett's report establishes the Idavada Volcanics as having caldera-related origins, while the GEM reports show the widespread occurrence of the volcanics in the areas of question. There are thousands of documented mineral deposits associated with similar caldera volcanics in Nevada, Colorado, New Mexico, Texas, Arizona, and even elsewhere in Idaho.

The recognition of the association of caldera-related volcanics and ore deposits is a recent advancement in the understanding of economic geology. Much of the U.S. has yet to be "restudied" in detail, including this area of Idaho. In the past six years alone, the U.S. Geological Survey has identified numerous previously unrecognized calderas, several with significant mineral resources, in southeast Oregon and south central Idaho, both immediately adjacent to the southwest Idaho area in question. The published literature on the association between calderas and mineral resources is truly vast, but the following general references demonstrate the significance of this recently recognized association:

Rytuba, J.J., 1981, Relation of calderas to ore deposits in the western United States; Ariz. Geol. Soc. Digest, Vol. 14.

McKee, E.H., 1979, Ash-flow sheets and calderas: Their genetic relationship to ore deposits in Nevada; Geol. Soc. Am., Special Paper 180.

Steven, T.A. et. al., 1974, Relation of mineralization to calderas in the San Juan Volcanic Field, southwestern Colorado, U.S.G.S. Jour. Research, Vol. 2, No. 4.

Elston, W.E., 1978, Mid-Tertiary calderas and their relationship to mineral resources, southwestern New Mexico: A brief review; New Mexico Geol. Soc., Special Paper No. 7.

McAnulty, N., 1976, Resurgent calderas and associated mineralization, Trans-Pecos, Texas; New Mexico Geol. Soc., Special Paper No. 6.

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Mr. Gary Carson
Page 3

December 5, 1984

Sillitoe, R.H., and Bonham, Jr., H.F., 1984, Volcanic landforms and ore deposits; Econ. Geol., Vol. 79 pp. 1286-1298.

References covering the U.S.G.S.'s recent identification of calderas in nearby areas include U.S.G.S. Circular 838 and the numerous reports on the just completed Challis Project.

In summary, we feel that previously unrecognized potential for mineral resources does exist within the Jarbidge Resource Area. That this potential is not recognized in the published literature points out the rapid development in exploration concepts and the danger in relying solely on the geological literature when making management plans concerning future land use. The input of highly experienced exploration geologists is irreplaceable.

We support a multi-use plan that allows access and mineral resource exploration and development until complete detailed geological field research finds no potential for mineral resources.

Thank you for the opportunity to present our comments.

Respectively,

TENNECO MINERALS COMPANY

Ed Speer

Ed Speer
Senior Exploration Geologist

ES/rf

41.1

M.J. Zimmer, Manager
Boise District, BLM
3948 Development Ave.
Boise, Idaho 83705

Dec. 26, 1984

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Dear Mr. Zimmer;

I have studied the Jarbidge Draft RMP/EIS and have some recommendations for setting the boundaries for wilderness.

The primary concern I have is for the BLM's exclusion of contiguous plateaus to the rims of the Bruneau R., Jarbidge R., and Sheep Cr. canyons. A margin of plateau of at least two miles along the canyons will help buffer any adverse effects of the adjacent areas. Five or six mile margins are certainly reasonable for parts of the canyonland. If a rim to rim plan for wilderness is chosen, then the integrity of the canyon habitat would suffer.

I cannot accept the BLM excuse, regarding the plateau, of "difficult to manage as wilderness." The draft RMP/EIS gives no reasonable argument in support of this claim. Plenty of evidence, within the document and my own experience, supports designation of those wilderness. The statistics within the RMP/EIS point out several major problems with non-wilderness uses of this area, yet the BLM proposes wilderness boundaries that would exacerbate these problems (erosion, overgrazing, loss of habitat).

In the Garbidge RMP/EIS there are statements describing the western plateau of the Garbidge R. as having "good wilderness characteristics," and the eastern plateau as having "low wilderness quality." However, the Ecological Condition map 362 designates both sides of the Garbidge (plateau) with fair to poor ecological zones. Yet, the BLM's preferred wilderness for the Garbidge R. excludes the eastern plateau and includes a good (a good start that is) margin of the western plateau. These contradictory findings lead to the conclusion or presumption that the boundaries were drawn arbitrarily and without an attempt to enhance the quality of the canyon wilderness area. Presumably, the BLM is citing the vehicle ways of the eastern plateau as a major reason for exclusion. This argument is lame. First, these ways are not significant (legally or physically) hindrances to reclamation processes of the area well protected. Second, to the cry of "how can we stop ORV use?" I can only point out the obvious. If a wilderness boundary is made clear, there will be less ORV use than if nothing (as BLM proposes) is done to protect the plateaus. Furthermore, this desert plateau has its own wilderness qualities, as pointed out in Appendix J-8, that

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cannot be ignored. I'm very disappointed in this draft proposal's inadequate coverage for wilderness. It does not come close to a reasonable consideration of the lands of the Garbidge and Brunson rivers (of these 1,690,473 acres of BLM land only 208,833 acres are considered as WSA or 12%). For instance, much of the proposed riparian/aquatic fencing of the East Fork of the Brunson Canyon might better be served by substituting wilderness designation where possible. The West Fork of the Garbidge, Columbat Creek, or the land between the Brunson and Deep Cr. didn't get consideration as an alternative plan. Also inadequate is the wilderness section of this RMP/EIS. A mere 20 pages, no matter how eloquent, is insufficient for this wondrous area. The wilderness potential of the Garbidge/Brunson is immense. It deserves much more effort in planning its borders (e.g. were endangered species studied) than is made in this draft RMP/EIS.

Wilderness is the best use for the Garbidge Resource Area.

I hope to continue to be involved with the planning process. Unfortunately I was unable to attend the public hearings this year. Could you please place my name on the mailing list for this issue.

Sincerely,
 James S. Fereday
 James S. Fereday
 46 College of Vet. Med. - OSU
 Corvallis, OR 97331

Martin J. Zimmer
 BLM Boise District Manager
 3948 Development Avenue
 Boise, Idaho 83705

December 25, 1984

Mr. Zimmer, and the JRA RMP/EIS Team:

Please incorporate the below considerations and recommendations in your final management plan, and add this letter to the JRA hearing record.

First, I would like to comment on your draft document: I found the data to be well tabulated, and noted evidence of a great deal of work on the information-gathering segment; however, there are two important aspects to alter before the final draft is printed. The first is an organizational consideration: the numbering of the text pages should be consecutive (no xi, vi, etc.), with the exception of appendix tables, maps, and figures. As presently organized, the August 84 draft is terribly difficult to use because of its organization. The other consideration has to do with a gross omission by BLM staff: there is much noise about so-called 'economic benefits' of development, but no significant analysis of what the various plans will mean to the taxpayer, ratepayer, or future owner of public land (i.e. future generations). Realizing that such an analysis is difficult, and the data at times elusive or nonexistent, I still maintain that aspects such as future economic benefit of recreation (and what will be the magnitude of economic and aesthetic loss due to development), value per hunter/fisherman/hiker/boater day, loss due to deficit timber sales - both immediate losses, and future costs due to fisheries/soils/wildlife/recreation opportunities losses, subsidization of pumping costs by ratepayers (how much would be saved by recommending against DLE or CA projects), subsidization - actually a triple subsidization - of agricultural development (we pay farm price supports, pay present farmers to keep land idle, and pay for the development of public land for private gain), artificially low grazing fees (what about unfair competition with privately owned pastures?), costs of mitigation efforts for soil stabilization, closure of roads, reseeding/forestation costs, stabilization/protection of riparian areas, et al. How much would the public save by recommending the least intrusive management plan? I contend that without this, and related, data, it is unrealistic to recommend a development-oriented option such as your preferred alternative. It cannot be justified environmentally or economically. It precludes options and results in the subsidized destruction of our public land. Land stewardship has been replaced by lobbying for the commodity brokers. Your Alternative D is by far the most sound in terms of economics and ecology. It permits the greatest degree of true multiple use, and, along with the recommendations given below, offers the most hope for ethical land management, cost-effective use, and flexibility.

I recommend that you adopt Alternative D with the following additions/alterations:
 No agricultural development, or sale or exchange to permit such development should occur. No lands should be selected for DLE or CA status or disposal. The Snake River and the ground water has already been over-allocated. In addition, it is criminal to require the ratepayer to subsidize (for a second time) development of additional farm land. Loss of power generation capability and a \$3.6 million subsidization in electrical costs (your figure) cannot be tolerated, and is totally unjustifiable - both economically and environmentally.

The entire area should be closed for DUE/GA application, including the 13,840 acres proposed for transfer (this transfer should not occur).

December 23, 1984

Livestock grazing should be reduced to 100,000 AUMs (or less), and fees should be restructured to reflect the fair market value. A complete prohibition should be initiated on grazing near (1/2 mile buffer) riparian areas. Fencing should concentrate on protection of riparian and grassland areas. No pipelines or water projects should be developed on the JRA. Spring and winter range grazing restrictions should be implemented to foster habitat improvement.

Marvin J. Zimmer
District Manager - BLM
Boise District Office
3948 Development Avenue
Boise, Idaho 83705

I have no objection to the use of prescribed burning to encourage favorable conditions for native grasses and forbs. However, I am opposed to burning when the goal is to increase the forage for livestock, unless significant wildlife benefit can also be shown.

Mr. Zimmer, Please include this letter in the JRA EIS record.

The BLM should cease leasing for oil, gas, and mineral exploration/entry. There is little, if any, significant value in minerals, and the impacts on the land cannot be justified. Present leases should be allowed to expire without option for renewal. All USAs, ACRCs, SRMAs, cultural, and paleontological and riparian areas should be permanently withdrawn from mineral entry/lease. Approximately 1.1 million acres of the JRA should be withdrawn from mineral exploration.

In regard to your Jarbridge RMP and EIS, I strongly urge you to adopt Alternative D. I believe that the maximum protection of the noncommodity resources is the best way to serve the needs of the public, and provide for proper stewardship of the public land. In particular, I would like to see official wilderness status for the three areas identified in Alternative D.

All 208,888 acres of the WSAs should be recommended for official status as wilderness, and Salmon Falls Creek should be designated an ONA (Outstanding Natural Area). The King Hill, Bruneau-Sheep Cr., and Jarbridge River WSAs deserve protection as wilderness, should be withdrawn from mineral entry, and avoided by utility ROWs. If not officially designated as wilderness, the above areas should be managed as follows: permanently close to ORV travel, establish no roads or ways, withdraw from mineral entry, restrict grazing, withdraw from utility ROW consideration, and otherwise manage to enhance the opportunity for solitude and to maintain a natural area. ACRC and SRMAs should receive the same restrictions on use as noted above.

No agricultural development of any kind should be allowed or encouraged on public land. No transfer or sale should occur to allow farming either. The strain of this sort of inappropriate development is intolerable. Adverse impact would occur to ground water supplies and surface water (both already over-allocated), as well as result in further subsidization by taxpayers and ratepayers. We are presently subsidizing local and area farmers to keep their land idle, and further subsidization of electrical energy (for pumping water) is unjustified and unreasonable.

1.2 million acres (or 70%) of the JRA should be closed to ORV use. All winter range areas should be closed, as well as Fall and Spring grazing areas, with a five-mile buffer from ORV intrusion. Over the snow vehicles should be restricted to maintained roads from November 1 to April 30.

ORV use on public land should decrease significantly. I would like to see more area closed to ORV use, including a permanent closure of all USAs, SRMAs, riparian areas, winter range, and natural grasslands areas. A minimum of 60% of the JRA should be closed to ORV travel (not 15% as noted in Alternative D).

The BLM should recommend against new dam projects or "water development" projects, and should press for critical ground water status and restriction for the entire JRA. Wildlife use and habitat should receive priority over livestock grazing in allocating a limited resource such as water in the JRA.

Grazing fees should be increased to follow fair market value, while AUMs need to be reduced to approximately 110,000 (± 2,000).

Curiously, I find it necessary to remind you that BLM-administered land is public land. Land stewardship, not exploitation or commodity production, is the charge of the BLM. Alternative D is the minimum level of curtailed use that is reasonable, provided that the above provisions are also included.

I recommend that you make a more concerted effort to analyze the true impact of uses on public land. I submit to you that a reasonable analysis would show that wilderness designation is not only the most environmentally sound decision, but also the most cost-effective. I grow tired of subsidizing all manner of taxpayer ripoff projects in the false facade of "pioneer spirit" (i.e. opportunism and greed), or "independent rights" (i.e. the right of the public to subsidize the destruction of their public land for the corporate benefit of the few). Loss of wildlife habitat, loss of wilderness areas, loss of economic base (through loss of wild and scenic areas), loss of power generation capability, loss of aquifer recharge and level, loss of soils, loss of fisheries, loss of native species, and much more. Subsidization of development (power costs, false supports of AUMs, payments for idle lands, deficit timber sales, etc.) and resource destruction. How can such an equation be termed "multiple-use"? Adopt Alternative D, as a minimum.

Thank you for this opportunity to submit comment.

Robert Jones
Robert Jones
1105 South 3rd Street
Pocatello, Idaho 83201

Leola Harris
Leola Harris
1105 South 3rd
Pocatello, Idaho 83201

Mr. Joe Zimmer, Manager
Boise District, BLM
3948 Development Avenue
Boise, Idaho 83705

December 25, 1984

December 27, 1984

Dear Mr. Zimmer,

I have carefully looked over the proposals for wilderness in the Jarbridge resource management plan and Environmental Impact Statement (EIS/EIS). I find this document inconsistent.

Joseph Zimmer
Manager, Boise District
Bureau of Land Management
3948 Development Avenue
Boise, Idaho 83705

Dear Mr. Zimmer:

I am an Idaho resident and user of the Boise District BLM lands. Please enter the following comments into the record concerning the draft EIS/EIS for the Jarbridge resource management plan.

I find the draft EIS/EIS for the Jarbridge-Bruneau deficient in several critical areas:

The Jar-LLI has an inexcusable bias toward commodity development of the resource area. I feel that more than 12% (209,000 AUMs) of the 1,670,000 AUMs (acres) of the land administered by this agency deserves wilderness consideration. The wilderness alternatives given in the Jar-LLI are quite skimpy. Many areas that I believe are crucial to maintenance of a quality wilderness in the Jarbridge were excluded. The table lands above the canyons and many tributaries of the Bruneau and Jarbridge Rivers were generally excluded for reasons poorly, if at all, explained by the draft Jar-LLI.

The Jar-LLI document had plenty of text devoted to non-wilderness uses such as agriculture, ORV use and grazing (AUMs). But in the same breath, so to speak, there is discussion of the poor existing quality of the table lands. Furthermore, with the BLM's proposed increase of these multiple uses, the lands would suffer even more, degrading from "poor" to something even more damaged. Where is the sense in this document?

If wilderness is to be considered at all, let's not do a poor job of it. Wilderness was definitely shortchanged in the draft proposal so I hope the final document contains many changes. I recommend that the entire draft be rewritten with some reasonable proposals not only for wilderness, but for all uses of the public's resources in the Bruneau-Jarbridge.

Thank you for the opportunity to comment. Please keep me informed of the progress of this management unit.

Sincerely,
Mark Vincent
Mark Vincent
2037 a Hearst
Berkeley, CA 94709

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1) The economic analysis fails to include Ada County and Twin Falls County, economic inputs and impacts from the use of the Bruneau-Jarbridge clearly extends to these two counties and the omission of analysis of economic factors involving these two counties is quite surprising.

2) The draft EIS/EIS has a very superficial analysis and organization in reviewing all spectrums of recreation in the resource area.

3) The draft EIS/EIS appears to have no mention of endangered species. If this document purports to be an environmental impact statement, your staff might carefully review the regulations they are required to follow in drafting a proper EIS. To my knowledge, there are several species of trout in the Bruneau (and possibly the Jarbridge), plus the white sturgeon habitat affected in the Snake River. That should be considered in describing impacts of further grazing and watershed changes in the Bruneau, both forks of the Jarbridge, and Sheep Creek. It is probably that endangered or threatened bird species, such as peregrine falcons, are also native to the area. As far as flora goes, there is no doubt that the Jarbridge alpine/Desert ecosystem is very unique in its extension of alpine plant forms into the Great Basin province. I am not knowledgeable of the plant species but what I have observed in the Bruneau and Jarbridge arouses my curiosity as the rarity of various plantlife. The lack of analysis of rare plant forms in the draft EIS/EIS is disturbing.

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4) The wilderness boundaries in the BLM's various alternatives are wholly inadequate. Even the "best case" wilderness does not preserve the ecosystem intact because of the failure to include plateau lands between the Jarbridge-Bruneau-Sheep Creek Rivers. I would like to have also seen a better map or commentary concerning the Nevada designations for the Jarbridge mountains as they are the headwater country for much of the

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47.3 resource area. The "low wilderness quality" you describe on the western plateau of the Jarbidge on ecological conditions map 3-2 does not agree with other statements referring to "good wilderness characteristics" for the same lands. It is very difficult to discern who outlined and why they outlined the wilderness analysis in the way it was done. It appears to be a scattering of thoughts, with the 20 page appendix in the back almost as an afterthought. Forwarding recommendations to the President and Congress on such a poorly organized wilderness study would give me pause. I hope Congressmen will be alerted to the inadequacies of the study and its alternatives before taking any action. Perhaps the whole wilderness section should be rewritten in a separate document.

47.4 5) Management practices and recommendations in the draft AAL/11 are also contradictory and poorly outlined. The impacts of further pumping, roadways and increased grazing are not analyzed in depth, particularly in regard to erosion and the economic analysis. The comments about "unmanageability" of certain wilderness designations are quite unfounded, with not discernible criteria set forth for what makes an area manageable. The manageability of an increased AWA, as proposed in many places, is certainly questionable because much of the range is already in a degraded condition. There are measurable objectives for judging soil and water conditions when the commodity output or CVA use is increased. Likewise, measurements can be made for the beneficial results of increased wilderness, ~~both~~ hydrologically, biologically and economically.

In summary, the draft AAL/11 for the Jarbidge resource area is a shockingly poor document both for future management of the lands and for wilderness designation. I recommend that you alter your planning cycle and redraft this document with more informed analysis and reasoned alternatives.

I appreciate the opportunity to comment on lands I know and enjoy. Please keep me informed of your next steps in the planning for the Jarbidge resource area.

Sincerely yours,

Ray Hammel
Ray Hammel

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December 28, 1984
1109 Highview Lane
Twin Falls, Idaho 83301

Mr Gary Carson, Jarbidge Area Manager
Boise District Office, BLM
3984 Development Avenue
Boise, Idaho 83705

Dear Sir: Ref: 1516.7 JRMW

I have been following with great interest the work being done by the BLM on the Resource Management Plan/Environmental Impact Statement for the Jarbidge Resource Area. I have every confidence it will be resolved to the benefit of the most people concerned. I would like to offer the following comments on the draft, and my own personal observations.

I have lived in Twin Falls County all my life except for a short period during the Second World War. Forty of these years I was in the coal packing business. During this time I have made some very good friends in the livestock business in the Three Creek and Jarbidge areas. I have also been able to enjoy the desert, mountains and canyons of this West area. I am now retired, so I am spending a considerable amount of time enjoying my hobbies -- hiking, camping, hunting, fishing and exploring. Most of this time is spent on the ranches and BLM land in the Three Creek-Jarbidge area, and I appreciate the freedom the ranchers and BLM have given me to freely go from place to place.

Murphy's Hot Springs has been my second home for many years, as it is conveniently located for all the things I like to do, and I have recently built a small log cabin on the banks of the Jarbidge River.

I represent myself only in my comments, and they pertain mainly to recreation, livestock and wildlife in the Jarbidge and BrunEAU River area.

My main objection is to the proposed Wilderness boundary lines you have proposed on Alternative C and B - Map 2-1. Management Alternatives. Even on Alternative C, the boundary line proposed on the west side of the Jarbidge River is up to four miles away from the river. Most recreation activity on the river would be sightseeing, photography, hiking along the canyon rim, and hunting and fishing. In my opinion there would be too few people able to use this area and the rest of the area along both sides of the Jarbidge and west BrunEAU Rivers. The distance is too far for the average person to walk both ways to and from the rivers. Most people have only one or two day weekends for recreation, and I think only those who were able to plan several days of their vacation time would be able to use this area.

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This plan, I feel, would also make it difficult for the ranchers to take care of their livestock, maintain fences, haul salt blocks, etc. Most of this work is now done with trucks, and to use horse and wagon to travel these distances from ranch headquarters would take too much time.

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Clive R. B. Lister
3414 1st Ave. N.E.
Seattle, WA 98102
27 Dec 84.

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The BrunEAU and Jarbidge Rivers are one of the main routes for low flying aircraft from the Mountain Home Air Base. The level of noise from these planes would detract from the atmosphere of a large wilderness area where vacationers seek solitude and quiet.

I believe Alternate B: Map 2-1, item #2 - Jarbidge Wild and Scenic River, and item 47, BrunEAU and Sheep Creek WSA and Jarbidge River would be the best Wilderness boundary lines for most people concerned.

I also believe the ranchers and BLM should continue working with the Fish and Game Department in building and maintaining an adequate herd of Bighorn Sheep on the Jarbidge and BrunEAU Rivers. If the Bighorn Sheep are not compatible with the cattle and domestic sheep on the range, the problem could be worked out as it occurs.

I would also like to see the Fish and Game Department plant from 50 to 75 head of Elk in the Jarbidge Mountain Wilderness Area. I am very familiar with this mountain range, as I have hiked over most of it during the past 35 years. Again, if the Elk would be a problem to the ranchers in the winter, the problem could be met as it occurred.

These are just a few comments on a large program. I feel sure it will ultimately be a success.

Sincerely,

Frank R. Florence

Frank R. Florence

Bureau of Land Management,
Boise District Office,
3984, Development Ave.,
Boise, ID, 83705

Comments on Jarbidge Resource Management Plan.

I am in favor of Alternative D of the E.I.S.

There are three items I regard as exceptionally important.

- (1) Salmon Falls Creek should be designated an Outstanding Natural Area and managed as an SRMA
- (2) Full Wilderness protection should be extended to the BrunEAU-Sheep Creek WSA.
- (3) Range improvement should be economically justified by normal rates of return on investments made. Whenever the rentals charged for AUMs fail to cover development and administration costs, range privileges should be reduced. A maximum ratio of 8:1 of live stock to big-game should be established for range areas. Public financed improvements should be for wildlife only.

I believe that your "preferred alternative" could be modified to meet these concerns. Language dealing with economics of the range management can be added readily.

Clive RB Lister

Jack Trueblood
Rt. 3 Box 3496
Nampa, ID 83651

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Dec. 27, 1984

Mr. Joe Zimmer, Manager
Boise District BLM
3948 Development Ave.
Boise, ID 83705

Dear Mr. Zimmer:

Please enter this letter into the record of testimony on the Draft Jarbidge Resource Management Plan and Environmental Impact Statement.

As a member of the Committee for Idaho's High Desert, I support their proposals for management, including a 340,000 acre wilderness for the Bruneau-Jarbidge and surrounding plateaus. One of the major arguments that crops up against wilderness in BLM areas is manageability, and I think this is an issue that your agency should learn to deal with early in the BLM wilderness issue which is upcoming throughout the west. Traditional forest wilderness has been comparatively easy to manage because terrain limits access, and it is easy to understand the problems faced by BLM. However, with this issue comes the inherent mandate for your agency to learn to manage any wilderness, not just those which demonstrate ease of management. It would be far better, in my view, for BLM to understand the requirements of managing any area Congress may designate rather than to be forced to deal with the problem after such designation. The Wilderness Act does not say that federal agencies will manage wilderness areas which are easy, just that they will manage them. To drop plateaus and other adjacent areas which are part of the integral system because of manageability problems is not, in my view, a valid proposition under the Wilderness Act.

I support the BLM proposal for the King Hill wilderness.

I support Wild and Scenic Rivers status for the Bruneau-Jarbidge and Sheep Creek, including the East fork of the Jarbidge.

As in the other EIS comments I have entered, I am concerned about the impacts on wildlife habitat for the benefit of livestock and agriculture. At one time sagehen were plentiful everywhere in Owyhee County, but with development their numbers and habitat areas have declined. They are a species which is non-compatible with development, and the surest protection for them would come with wilderness status and limited livestock impact on rangeland. I question the benefits which accrue to sage grouse from burning/seeding operations which occur primarily for the benefit of livestock. Elk were a native species in much of the west but were eradicated when ranching intensified. This area presents an opportunity to restore elk to such localities for the benefit of future Americans.

The proposal to support large agricultural developments is totally unreasonable for many reasons, not the least being the destruction of portions of the desert ecosystem. With farm economy down, and farmers going bankrupt at a rate not seen since the great depression, it seems ridiculous to open more large expanses for agriculture. In addition, the availability of water is a question not yet resolved. Snake River water is limited, and the availability of water for deep-well pumping is questionable. Topsoil erosion from large developments

is reaching alarming proportions nationwide, and I should think that federal agencies would attempt to limit opportunities rather than encourage them. Also, as long as there are programs like PIK in force, which pay farmers not to grow crops, it seems ridiculous to encourage further exploitation of public land to make a bad situation worse. All too often those who profit from such ventures are large companies or other sources of investment cash, and the farming community/economy itself does not really benefit.

It is very disappointing that the economic analysis of the draft RMP attributed little or nothing to the presence of game animals, but spent nearly two pages extolling the benefits of livestock; even going into comments on the value of grazing permits in other states. A survey of hunters and fishermen would demonstrate the value of wildlife to the local economy. For instance, a large number of federal-payroll people from the Mountain Home air base enjoy the wildlife of the area. They buy gas and provisions in Mountain Home and in many cases never leave the area covered by the RMP. Others from Boise and the rest of southwest Idaho enjoy this area, but the income derived from recreation was not even mentioned here where comparison would have been interesting and useful.

It is rather sad that so many groups must fight for wilderness designation to keep these types of land from destruction. When I was a boy it seemed that the huge area you manage as the Boise District was a permanent fixture. Folks in the Boise Valley termed most of it desert, and those who used it were ranchers, hunters and rockhounds. Virtually no one knew about the special places deep in Owyhee County like the Canyonlands, the Bruneau, or Jocks Creek.

Now it is obvious that such places are not inviolate fixtures, for we have to plan their future. Improved access has opened your district up to an entire new group of users, from agriculture to naturalists, and each wants their special type of use to continue. All of us seem to want the "character" of the Owyhee country to remain intact, from the rancher who takes pride in his ability to survive in a rugged land to the wilderness-purist who hopes to save some parcels of high desert grassland.

Your dictate from the government is to preserve these lands for their public owners, and to manage them in the public interest. That so many should fight for wilderness, in my think, indicative of the public's awareness that America's vast storehouse of natural areas is past its zenith, and declining at a rapid rate. Since industrial, commercial and agricultural interests are consumptive uses which leave these areas unfit for preservation in a natural state, the public is supporting protection in the most legally sure way available today - inclusion in the National Wilderness Preservation System.

Seeing the changes that have taken place in Owyhee County since the 1950's, and how long-lasting the scars can be, brings me to the realization that wilderness boundaries are the only way to insure that future generations will be able to understand how we found the Owyhee country - and why we thought it was worth saving.

Thank you,
Jack Trueblood
Jack Trueblood

52

Richard Anderson Ph.D.
Box 361
Jackson, N.H. 03846

53

Dear Sir:

I appreciate the opportunity to comment on the Jarbidge RMP and EIS. I favor the implementation of Alternative 'D' rather than the proposed alternative 'C'. We need to protect adjacent lands to the canyons, not just the canyons themselves. While I do not favor elimination of grazing in this area, I do favor restricted use to allow some grass regeneration and succession. I am concerned that the BLM receives too much pressure from ranchers to manage lands for short term goals for livestock at the expense of soils, competing mammals, and wilderness values. If surrounding lands are not protected, they will be subject to increasing invasion of planned & unplanned roads and trails. RV and ORV use will have a negative impact on rare species and opportunities for solitude.

Richard Anderson
Richard Anderson Ph.D.

December 29, 1984

Mr. Martin I. Zimmer, District Manager
Boise District
3948 Development Ave.
Boise, ID 83705

Dear Mr. Zimmer:

Alternative seems like the only satisfactory alternative as it protects our precious ~~resources~~ resource. While it is a renewable resource to a certain degree it is easily damaged or destroyed.

I would be more sympathetic to cattle grazers but they should remember that they pay the government much less for grazing rights than they pay to private interests and yet through overgrazing they have often done much damage to the land and have not helped their animals. It is easier to blame wildlife for animal losses than to blame the living and/or poor animal management practices.

We especially need to protect the environment with this administration which gives mostly lip service to the environment and is only willing to sacrifice long-term benefits for temporary profits.

Yours truly,

Richard Anderson



United States Department of the Interior

GEOLOGICAL SURVEY
RESTON, VA 22092

In Reply Refer To:
WGS-M11 Stop 423

DEC 27

55

54

Memorandum

To: District Office, Bureau of Land Management
Boise, Idaho

From: Assistant Director for Engineering Geology

Subject: Review of resource management plan and draft environmental statement for Jarbridge Resource Area, Idaho

The following comments are intended to supplement those in our memorandum of December 3.

We have found it difficult to assess potential impacts of wilderness designation or other land use decisions on energy and mineral resources of the Jarbridge area because of the scarcity of data in the environmental statement and management plan. We found no description of the geology of the area or maps showing known or potential energy or mineral resources. Historical exploration and mining activities are described (DES: p. 3-23, 3-26) without any indication of possible future activities. The only description of mineral potential under the preferred alternative is the statement that "The areas are not favorable for the discovery of metallic minerals and have only a low to moderate favorability for industrial minerals (diatomite)" (DES: p. 4-53). No supporting evidence is provided for this assertion.

54.1

JRB
for James F. Devine

Dear Mr. Zimmer,

12/27/84

Please enter this in the hearing record for the Jarbridge RMP. I am a long time resident of Idaho and I have taken at least one recreational trip to this area every year since 1974. I feel that it is the most spectacular desert canyon system in the Northwest and deserves protection as designated wilderness. You know as well as I do that a wilderness system needs a diversity of ecotypes to maintain the biotic communities. Also, a road to the rim of the canyon compromises the wilderness characteristics of that whole stretch of the canyon. To this end I urge you to protect more of the plateau lands between the canyons (300,000 total acres). Present area can continue under this designation.

Please don't fall into the trap the Forest Service has gotten into of feeling they have to listen to the present commodity users more than the general public. These people (mostly grazers) have only their own short-term interests to look out for. This land belongs to all the

America's First and Finest All Seasons Resort.
Sun Valley Company Inc./Sun Valley, Idaho 83363/Telephone 208-622-4111

people of the U.S. and the long term value of this land far outweighs the few increased grazing units that may be gotten by manipulation.

55

Please consider the long term best use of this land and include the East Fork of the Jarbridge in the natural system.

R.E. King Hill wilderness

As the former County Planner for Blaine County, I am very aware of the value of this area for big game winter range. Roads have already been built through all the logical places in this area. Please put a wilderness designation on the 29,000 acres that remain. Each of conflicting uses should make this an easy recommendation.

Keep up the good work and timely draft reports. The BLM holds the lands that may define the future of the Western U.S. It's a big responsibility.

Thank you for this opportunity, I will treasure the experiences I've had in the Brunson Jarbridge as long as live and I want others to have the opportunity.

Alan Reynolds
Box 1479
Ketchum Idaho 83340

RECEIVED

DEC 28 1984

56

Bureau of Land Management
Boise District

December 27, 1984

Mr. Gary Garson, Jarbridge Area Manager
Boise District Office, BLM
3948 Development Avenue
Boise, ID 83705

Dear Mr. Garson:

56.1 I have reviewed the Jarbridge Resource Management Plan and Environmental Impact Statement, and was disappointed to find no mention of Threatened and Endangered plant species. I would like to point out that two Federal Category 2 plants are known to occur within the Resource Area, *Eriogon latum* and *Lepidium davisi*.

As you probably know, Category 2 plants are those plants for which we currently have inadequate data to support listing as either Threatened or Endangered. While public agencies are required to consider only those species which have either Threatened or Endangered status in their management actions, it is to the best interest of land managers and the general public to consider candidate species also. In fact, consideration of candidate taxa in management actions is probably the best way to avoid listing of these species as Threatened or Endangered.

56.1 I would also like to point out that both *Astragalus mulfordiae* and *Astragalus campopis* (both also Category 2 species) are historically or currently known from within a few miles of the Resource Area border and they could reasonably be expected to be found within it.

56.2 Finally, some statement to the effect that state sensitive plant species will be considered in management actions would be appropriate. It is the moral, if not legal, obligation of Federal agencies to manage public lands with due consideration for the natural heritage of the citizens of Idaho.

Thank you for the opportunity to comment on the RMP and EIS.

Sincerely,

Steve Calcoco
Steve Calcoco, Botanist/Ecologist
Idaho Natural Heritage Program
4696 Overland Road, Suite 518
Boise, ID 83705

Mr. Joe Zimmer, Manager
Boise District BLM
3948 Development Avenue
Boise, Idaho 83705

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Dear Friends,

I am writing to comment about the Jarbidge RMP/EIS. I am urging that the area be managed in such a way as to stabilize erosion and to protect wilderness values. These are public lands which I use and on which taxes I pay are spent.

As a backpacker and photographer, I have gained a strong appreciation of the wilderness values of the Brunseau/Jarbidge/Sheep Creek Canyonlands and the surrounding plateaus. I've seen a substantial portion of the Brunseau and all of Sheep Creek. I essentially know the Brunseau from the mouth of the canyon up to near the confluence with Sheep Creek, and I've traveled Sheep Creek inside and out. My experiences with these canyonlands convince me that they should be preserved as wilderness and not be compromised to any use that could degrade them. The canyons and their surrounding plateaus are a valuable resource for this and future generations. The 340,000-acre wilderness proposal of the Committee for Idaho's High Desert is the only reasonable proposal for wilderness in this area. A risk-to-life wilderness as proposed by the BLM is not acceptable. The plateaus are part of the canyon ecosystem. A person walking the canyon rims encounters the plateau country as part of the experience, and the experience as a whole will be irreversibly degraded if the plateaus are not managed as wilderness. Wildlife species such as mule deer and coyotes need the plateau area to be protected as part of their habitat.

We are told in the RMP/EIS that the plateaus are in poor ecological condition and that they cannot be ecologically managed as wilderness. I think that the area still retains great attractiveness in spite of ecological problems such as invasion by cheatgrass. The experience of looking and walking across all those miles of desert is an experience that should be preserved somewhere for future generations, and near an impressive canyon is a good place to do it. Further degradation should not be allowed to occur. The cost of management is a function of methods of management and is relative to the cost of other forms of management. I think cost-effective management methods are worth developing whether they exist at present or not. The cost of the present form of management, which emphasizes cattle and is for the benefit of cattlemen only, is unreasonably expensive in terms of both money and environmental degradation. It's time to try management for values that can be passed on to future generations. The potential of this area for wilderness and wildlife is outstanding.

Although I've never been in any part of the Camas Trail-Bennett Hills wilderness, I've heard good things said about the area. I'm glad the BLM is recommending wilderness for the area, especially considering that there is elk winter habitat to protect there.

I strongly oppose any plans to increase cattle grazing, and I question whether converting public land to agricultural private use to be plowed and planted is a good idea. Both cattle and homesteading cause high levels of erosion and sedimentation. Cattle are possibly the worse problem of the two if homesteading is occurring only on deep soils. One of my concerns is that cattle grazing is occurring in places where erosion threatens to reduce large tracts of land to bare rock or cause the soil to become so thin that native vegetation cannot compete with species like cheatgrass. The cow is not

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in harmony with the ecology of the desert out there. Wildlife, not cattle, are the animals the area should be managed for. Cattle grazing on public lands accounts for too small a portion of the economy to be worth the price taxpayers and wildlife are paying to subsidize the cattle industry.

The plans to promote Wild and Scenic River status for the Brunseau-Jarbidge and Sheep Creek are pleasing. The Wild and Scenic River should include the East Fork of the Jarbidge so the river ecosystem will be protected all the way to the Jarbidge Wilderness.

The proposal to reintroduce elk into the Jarbidge country is one of the best news the BLM brought. And all plans to give protection to his same winter habitat are commendable. Winter habitat is an important limiting factor deciding the upper limit on the numbers of wildlife which the resource area will support.

What I would like to see is a steady increase in the numbers of wildlife and a steady decrease in the numbers of cattle. I don't know how much wildlife the area will support, but what that figure is is a valid topic for public discussion. The BLM should come up with a formula for estimating how much wildlife, especially viable wildlife such as big game and species which are critical to the balance of nature out there, the area will support. After the formula, the next step is coming up with some figures and making them public. At present the land is being managed for the benefit of an interest group, the cattlemen, which is expensive to maintain on the public lands.

I would have nothing against cattle if I did not believe cattle are causing unreasonable levels of erosion out there. Most developments designed to accommodate cattle are not particularly bothersome to me from a scenic standpoint. What I don't like are roads and erosion. Future generations have the right to see a landscape unscarred by roads and erosion. Fences all over the place are not healthy for wildlife which has to risk getting hung up in fences all the time of course. The heart of the matter is that the soil and the plant communities which are native out there have value to wildlife and to future generations. Cattle grazing is hurting the wildlife and causing erosion of the soil. Cattle grazing is not the use of the land which is most appropriate. Criteria for appropriateness are scientific value, esthetic value, recreational value, and economic value among other values. Ugly scars on the land, desertification, and destruction of native plant and animal communities are the sort of things that are disillusioning and are contrary to generosity. Generosity is life, being optimistic for the future, and the holistic reasonableness of living and rejoicing in harmony with nature. That land will support uses which benefit people and which are sounder than increases in cattle grazing. The debate over whether high densities of cattle out there are possible unaccompanied by unreasonable destruction and unreasonable cost is over. The debate was not won by the cattle.

Sincerely,

Brent Knapp

HUGHES
River Expeditions
P.O. Box 217
Cambridge, Idaho 83610
(208) 257-3477

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December 31, 1984

Mr. Gary Carson
Jarbridge Area Manager
Boise District Office
BLM
3948 Development Avenue
Boise, Id 83705

Dear Gary,

I am writing with regard to the draft Resource Management Plan/EIS for the Jarbridge Resource Area.

I strongly support protection of the Jarbridge, Brunseau, West Fork of the Brunseau System as a National Wild River System, and I strongly support a canyon wilderness surrounding these rivers. To my eye, these rivers and canyons are among the wildest, and most beautiful in the United States, and they certainly deserve classification as Wild Rivers & Wilderness.

As a river boater, I know from experience that the rivers and the canyon, at least, from rim to rim, deserve protection. However, I also understand that portions of the plateau lands surrounding these canyons should be included in an appropriate wilderness area to protect big horn sheep habitat. I support the BLM's 'Preferred Alternative' C on this issue, with the exception of lands along the East bank of the Jarbridge River. I would support inclusion in a Wilderness of the appropriate areas to the East of the Jarbridge River. The Jarbridge is the wildest and most remote of the Canyons under study, and it also supports a big horn sheep population. I feel additional wilderness lands to the East of this stream would be appropriate.

I support the Preferred Alternative with the exception of my interest in additional wilderness to the East of the Jarbridge.

Protection of the Jarbridge, West Fork of the Brunseau, and Brunseau Canyons is important to me in two manners. I feel personally that these rivers and canyons offer the public the very best in backcountry, white water opportunities, and my opportunity to outfit for the public on these rivers is a very important business opportunity for my outfitting service. Protection of the area as both wilderness and National Wild Rivers is appropriate and essential for the area.

Please include these comments in the record regarding these issues.

Sincerely,

Jerry Hughes
Hughes River Expeditions

60

1/1/85
Box 1064
Rm 4
Buhl, Idaho
83216

Brent Knapp
Boise, ID
83705

Dear BLM Staff:

This letter concerns the Jarbridge Resource Area. Would you please do what has to be done to preserve its wilderness values. Present uses should generally be honored. Future development can reasonably ~~be~~ be a lower priority. As a farmer I have an economic interest in the soils in the region but there is so much

good ground out there that resource
planners should be able to encourage farming
away from the river. Low head dams
would be an abomination.

Thanks for interesting comments.

Sincerely,

Stanley & Alker

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Joe Zimmer, Manager
Boise District, BLM
3948 Development Ave.
Boise, Idaho 83705

Dec. 30, 1984

Draft Jarbridge RMA Plan

Dear Mr. Zimmer:

Your proposed draft Plan for the Jarbridge Resource Management Area places too much emphasis on livestock grazing and public land disposal, and not enough on retaining the natural values of this wonderful country. Indeed, your proposed plan would lead to serious environmental damage and to economic waste.

Please select a more benign alternative, which would include the following features:

1. Recommend for wilderness designation at least the 340,000 acres of roadless area in the conservationists' wilderness proposal. The opportunity to protect this great area of spectacular canyons and wild plateaus should not be foreclosed. Wilderness designation will better protect soils, watersheds, native plants, and wildlife habitat, as well as the recreational, educational, and scientific values of the incomparable Jarbridge-Brunau area.

2. Livestock grazing needs less emphasis. You should not increase livestock numbers, but probably reduce them where necessary to correct past overgrazing abuses, and to provide adequate forage for wildlife. I find it amazing that initially wildlife is only to be allocated 3% of the forage, with livestock getting 97%. This would hardly be multiple use.

Grazing improvements for livestock should be used primarily to correct past grazing abuses, and not to add more livestock or to place livestock in currently ungrazed, or only lightly grazed, areas. Improvements made for the latter reasons are frequently damaging to wildlife as well as costly to the government.

3. Protection of wildlife habitat and adequate feed needs more emphasis. The RMA is habitat for a variety of wildlife, including deer, antelope, cougar, bobcats, bighorn sheep, otters, golden eagles and other raptors, great blue herons, and red-banded trout. It is important to protect the habitat of these and other existing wildlife populations.

4. Retain your good recommendation of Wild & Scenic River status for the Brunau and Jarbridge Rivers and Sheep Creek.

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5. Don't dispose of any public land for irrigation development! Development of 70,000 acres would be a disaster, environmentally and economically. The DLE Act is an anachronism, and giving away free public land as your propose constitutes a large government subsidy which fuels a destructive activity.

Thank you for the effort which is going into this plan, and hopefully you will improve it along the lines suggested above.

Sincerely,

Jerry Jayne
Jerry Jayne
1368 Lola St.
Idaho Falls, Idaho
83402

BLM:

My name is Dennis Fitzgerald. I live in
Staley, Idaho & have so since 1970.

Regarding the Brunau Jarbridge wilderness
proposal, I am in favor of the 340,000 acre
wilderness proposal & support for King Hill. I am also
in support for the Wild & Scenic River status for
these rivers & Sheep Creek.

I have been down these rivers numerous
times in the past ten years & have enjoyed their
unsurpassable beauty.

Nearly every year a group of us raft &
hoyak these rivers in the springtime. We are now
interested in going later in the year, in order to
do some fishing & enjoy warmer weather.

Dennis Fitzgerald

Dec. 25, 1984
Rowland, Nevada

Bureau of Land Management
3948 Development Ave.
Boise, Idaho 83705

Gentlemen:

I am writing concerning the proposed Jarbidge Resource Management Plan and Environmental Impact Statement. My family has ranched here at Rowland for more than 40 years and I would like the following introduced as Testimony against the proposed Alternative for managing BLM lands on the Bruneau River and the surrounding Area.

I believe that my family and I enjoy seeing wildlife as much as anyone. We spend a good deal of our time outside as we take care of our stock and we always have time to view the many different species of wildlife and wonders of Nature found in our Area. We are not opposed to wildlife.

However we are opposed to making the Bruneau River from Black Rock Crossing south into Nevada an Area of Critical Environmental Concern for Bighorn Sheep. The majority of the Bruneau Canyon in Nevada is in Private ownership, and I do not feel the BLM should have

any jurisdiction over privately owned lands. Also the road at Black Rock crossing is more than a track. This road was used for freighting supplies to Jarbidge in the early 1900's and has had considerable construction on it. It still receives much use today.

Also I would contend that there will be greater conflict between Bighorn Sheep and people than there will be between Bighorn Sheep and Cattle. On page 71 of the Environmental Impact Statement it is stated that Primitive Recreation Use is a compatible use while livestock use is an incompatible use. I feel the Bighorn Sheep would benefit more if you reversed this and made cattle compatible and recreation incompatible.

I have to agree with many of the things that were stated at the public hearing Dec. 5 at the Three Creek School. I feel that Mr. Owen Barton made some very interesting observations concerning Wild and Scenic Rivers and also Wilderness Areas.

This Area has provided a living for my family since my Dad came here in the 1930's. We

have had a good relationship with the BLM during that time and feel the BLM has done a commendable job of managing the lands under their jurisdiction. We will be interested to see the Revised Management Plan and EIS.

Thank You,

Gary Stowell

Gary Stowell
Rowland Nevada Route
Bruneau, Idaho,

83604

George Holmes
P. O. Box 993
Twin Falls, Idaho 83303

Phone: 734-3593
Representing the Magic Valley Gem Club

BUREAU OF LAND MANAGEMENT
3948 Development Way
Boise, ID 83725

Gentlemen:

Re: Jarbidge Resource Management Plan

I prefer Alternate C.

The Jarbidge and Bruneau Rivers should be designated as "Wild and Scenic" with the side canyons included. Rim to rim protection is my preference.

Historical, Archeological and Paleontological sites should be protected for all time.

Save as much multiple use and recreational land as possible and give wildlife special consideration.

Thank you,

George Holmes
George Holmes
PR--Magic Valley Gem Club

Boyle Lake
Jan 1, 1985

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Mr Joe Zinner, Manager
Boise District B.L.M.

Dear Sir

During the month of October my husband and I and our two grandchildren visited part of the Jarbridge wilderness. We were amazed at the beauty and freshness. It has wilderness beauty, has made a deep impression on all of us and we have shared our experience with others and have advised us to learn what some people are proposing for this area. We are not opposed to the Prineau-Jarbridge + King Hill Area.

We sincerely support the plan that the C.H.D. propose and endorse it 100%. We believe there is a moral issue involved here. To destroy this beautiful wilderness would be a crime. To maintain this area healthy makes us want to be better citizens and to do what we can to save it.

Thank you. Please register our vote for C.H.D. plan.

Sincerely,

Mr + Mrs Frank Troeman

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P.O. Box 1708

Idaho Falls, Idaho 83401

Idaho Environmental Council

January 1, 1985

Mr. Joe Zinner, Manager
Boise District, B.L.M.
3948 Development Avenue
Boise, ID 83705

Dear Mr. Zinner:

This letter represents the position of the Idaho Environmental Council with regard to the Draft Jarbridge Resource Management Plan.

Wilderness. The I.E.C. supports the designation of a 340,000 acre Jarbridge/Bruneau Wilderness. Its boundaries have already been conveyed to you by the Committee for Idaho's High Desert. This would protect some plateau lands as well as the rim-to-rim canyonlands proposed for protection by the preferred alternative. Our proposal will serve to protect the entire ecosystem.

Secondly, we endorse your proposal for a 26,389 acre King Hill Wilderness. This will be, of course, one unit of a larger Camas Trail-Bennett Hills Wilderness.

Finally, the I.E.C. supports the designation of approximately 192,000 acres of Wilderness in the Bruneau-Jarbridge-Sheep Creek area. This will protect a sample of the salt desert shrub ecosystem which is currently not represented in the National Wilderness Preservation System.

Land Transfers. The I.E.C. is opposed to the transfer of 91,446 acres of public domain into private ownership. Perhaps some small exchanges and transfers are justified to rationalize boundaries and improve management, but such a massive transfer program can neither be justified nor condoned.

Wild and Scenic Rivers. The I.E.C. supports Wild and Scenic River status for the Bruneau-Jarbridge and Sheep Creek. It is particularly important that the East Fork of the Jarbridge be designated since it forms a link in an unbroken wilderness river ecosystem that extends from the headwaters in the Jarbridge Wilderness in Nevada to the Snake River.

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Other Issues. The I.E.C. would prefer to see increased numbers of wildlife instead of more cattle or agricultural development. The R.M.P. should seek to reduce and prevent soil erosion and should protect rare plant and animal species. All bighorn sheep habitat should be protected including that in Salmon Falls Creek and the East Fork of the Jarbridge. We support the proposal to reintroduce elk into the Jarbridge country.

Thank you for the opportunity to comment.

Sincerely,

Alan R. Hausrath

Alan R. Hausrath, President
Idaho Environmental Council

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Prairie Falcon Audubon Society

1520 Princeton Drive, Twin Falls, ID 83301
December 31, 1984

Mr. Joe Zimmer, Manager
Boise District, Bureau of Land Management
3948 Development Ave.
Boise, ID 83705

Dear Mr. Zimmer:

In behalf of the Prairie Falcon Chapter (Twin Falls) of the National Audubon Society, I submit these comments on the BLM's Resource Management Plans/Environmental Impact Statement for the Jarbridge Resource Area.

Many of our 68 members are familiar with this resource area because of its proximity to Twin Falls. While some of our members are ranchers and farmers, most of us believe that ranching and farming and wilderness are compatible, and favor much more plateau area along the Bruneau, Jarbridge, and Sheep Creek canyons included for wilderness designation. That would buffer these spectacular canyons from development and thus enhance their wilderness quality. We support 340,000 acres in the Bruneau-Jarbridge complex for wilderness.

Wildlife should receive prime consideration in these land managements. Elk and bighorn sheep should be reintroduced, since there is evidence they were once here. Cattle and sheep grazing allotments should not be increased. We have seen overgrazing on much of the BLM lands, with resulting deterioration of native vegetation and increased erosion of the soil.

We favor designation of Wild and Scenic Rivers for the Jarbridge and Bruneau rivers and for Sheep Creek.

We urge wilderness designation for the King Hill area under consideration, and for the Gooding City of Hooks area, if that falls under your jurisdiction in this study area. Several years ago our members testified in favor of wilderness status for this latter area, and have heard nothing since of action on that.

We appreciate the tremendous effort you and your staff have put into this study, and respect many of your field workers we have come into contact with. Thank you for giving us the opportunity to submit our comments.

Sincerely,

Jeff Ruprecht

Jeff Ruprecht, Pres.
Prairie Falcon Audubon Chapter

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Bureau of Land Management
3948 Development Ave.
Boise, Idaho
83705

Robert Barton
Diamond A Ranch
Rogerson, Idaho 83302
December 31, 1984

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Mr. Gary Carson
Jarbridge Resource Area Manager
Bureau of Land Management
3948 Development Avenue
Boise, Idaho 83705

Dear Gary:

I appreciate the opportunity you have given us to comment on the Jarbridge RMP/EIS Draft and would like to add the following written comment to the statement I made at the hearing in November.

The Diamond A is a cow-calf operation which utilizes private, state, and federal lands in a year round grazing program to produce food for the American Consumer. We take pride in our ability to convert a renewable resource into a high-protein food source and are presently doing that at a rate of about a half million pounds of on-foot beef per year. We believe in the concept of multiple use - sustained yield management and do not, indeed cannot, condone overgrazing and abuse of private or public rangelands. A healthy, productive resource base is the most important single requirement for a viable livestock operation, and I resent the charges leveled at the livestock industry in general by various special interest groups concerning livestock grazing on public lands.

Although the passage of the Taylor Grazing Act was an important step in reversing the trend toward overgrazing and abuse of our Western Rangelands, the more recent progress in the science of range management has given us the knowledge and techniques to improve the resource and benefit all user groups. The BLM is to be commended for its work as a public land management agency in putting the science of range management to work for the benefit of all the multiple uses of the range resource.

I am very concerned, however, with the future of public land management after trying to read and understand the RMP/EIS Draft for the Jarbridge Resource Area. I realize the constraints on time and money the plan was written under, and perhaps this explains how resource managers with the education and experience of your writing team came up with such a document. I also am of the opinion that land management by court order does not give the agency the best shot at good multiple use management of the public rangelands.

In commenting on the draft may I first point out a number of discrepancies that make the plan hard to understand:

- 1. The stated purpose of the RMP/EIS.

On pages iii and 71 of the RMP, and page 1 of the EIS, you say that the purpose of the plan is to "ensure that the public lands and resources are managed in accordance with the principles of multiple use and sustained yield as required by FLPMA."

On page 1 of the RMP, and page 1-1 of the EIS, you say that

some having substantial increases". Appendix table F-4 on page F-11 shows that under the preferred alternative 40 allotments will show an increase, 31 allotments will show a decrease, and 8 will stay the same.

It is difficult to understand the above statements and how they relate to the resource management guidelines identified on pages 78 and 79 of the RMP.

- 4. Special Recreation Management Areas

Page iv of the RMP indicates the upper Jarbridge and Cougar Canyon areas to be designated SRMA's. Page 11 of the RMP, and 4-50 of EIS, lists 6 SRMA's including Bruneau-Jarbridge Rivers and Jarbridge forks.

Is Cougar Canyon recommended for designation as a Special Recreation Management Area?

- 5. The proposed change in ecological condition under Alternative C.

Page 8 of the RMP states that 40,000 acres of fair and 63,000 acres of poor condition range would be improved under this alternative. The statement is also made that "the area contains significant acreage of rangeland with high potential for improvement through vegetative manipulation and improved livestock management techniques".

On page 9 it says that on poor condition ranges livestock use will be decreased to levels that will allow for improvement in range condition.

Page v of the EIS says that native range will remain unchanged for good-fair condition and that poor condition range will be reduced by 9%.

Page 4-44 of the EIS says only 2950 acres would improve from poor to fair or better, and that 40,000 acres would improve from fair to good or better.

Why aren't these statements consistent with each other? 9% of 799,416 equals 71,947 acres not 63,000. If only 2950 acres have the potential to improve, is that a significant figure? Will good-fair range improve or not?

On page 67 of the RMP you state that bighorn habitat is to be managed for good ecological condition.

Page 81 says that all poor-fair sites on wildlife habitat areas will be managed for good condition.

Page 44 of RMP states the goal is to maintain the existing ecological condition for MUA 10.

How is this possible since most of MUA 10 is mapped as poor condition?

- 6. Jarbridge Wilderness Study Area

Page 12 of the RMP says that the area has limited access and is

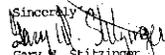
Sirs:

I wish to go on public record as being opposed to any proposed sale of lands within the Jarbridge Resource Area.

I'm a regular visitor and recreational user of the Jarbridge Resource Area, and the Jarbridge-Bruneau River watershed. I have hiked, explored, and camped over much of the area, as well as having done numerous kayak descents of this very unique and wild river system.

I consider the Bruneau-Jarbridge watershed to be the finest example of high desert river wilderness that we have in this country. And this is in spite of the fact that this area has not been given official wilderness status as yet. The areas' remoteness, its' lack of readily exploitable resources, and its' seemingly unforgiving nature have all contributed towards keeping this small pocket of southern Idaho clean, alive, and beautiful. And I do appreciate the efforts of the BLM in trying to at least keep it this way.

And I must vote NO to the use of pesticides, to overgrazing, to the excessive use of fertilizers, to soil and wind erosion, and NO to the loss of wildlife habitat, all of which will inevitably occur when high desert wildlands are more or less given to developers of marginally beneficial agricultural operations.

Sincerely,

Gary W. Stitzinger
Box 284
Ketchum, Idaho 83340

"the basic purpose of this plan is to ensure that public lands will be managed in accordance with FLPMA, under the principles of multiple use and sustained yield, and other principles as outlined in BLM planning regulations."

What are the "other principles" referred to, and does FLPMA stipulate management by any principles other than multiple use and sustained yield?

Why isn't the plan consistent in stating it's purpose?

- 2. Key issues to be resolved by the RMP/EIS.

On page iii of the RMP, and page i of the EIS, you make reference to 10 key issues identified by the public. Only 8 are listed and minerals and energy are omitted. Page iii of the RMP addresses 3 special management concerns while page i of the EIS addresses 4 special management concerns.

On pages 3-6 and page 17 of the RMP 9 issues and 4 management concerns are identified. Page 17 of the RMP, and page i of the EIS, identifies access as a concern while page 6 of the RMP says access was a concern but is not addressed in the plan.

The issues and concerns should be consistent throughout the plan.

- 3. Initial and long term stocking levels.

On page iii of the RMP, and page v of the EIS, you say initial stocking will be 172,493 ANM's, a 6% increase over current levels.

Page 8 of the RMP says that livestock stocking rates will be increased about 5% over current levels at the end of 5 years, after 20 years there will be a 55% increase over current levels, and that the initial stocking rate will be 172,000 ANM's.

On page 4-43 and 4-46 of the EIS you suggest a 6% increase over the short term and a 66% increase in stocking level over 20 years.

Page 4-55 says short term stocking rates to increase by 16,000 ANM's raising to an increase of 127,000 ANM's in the long term. Page 4-66 says short term increase of 9,000 ANM's and a long term increase of 108,000 ANM's.

Page 2-3 of the EIS says alternative A is "The proposed action for grazing". Page 4-4 states that under alternative A "no adjustments in short term ANM's are proposed". Page 2-9 indicates a conflict between alternatives A and C concerning range resources.

The obvious discrepancy between numbers and percentages is confusing. If Alternative A is the proposed action for grazing shouldn't A and C be the same as relates to range resources?

On page 4-45 the statement is made that "current grazing preference levels are expected to be met in all NCA's in the long term, with

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in fair and good ecological condition.

Page J-11 of the EIS suggests good access roads, ease of mobility etc. in the area.

Map 3-2 shows most of the area in poor condition!

70.1

How can access to the area be defined as limited with "good access roads and the ease of mobility across the flat tableland" used to describe the area? What is the ecological condition of the area?

7. Cultural Resources

Page 14-RMP states that there are 47 dry lake beds between the Bruneau and Jarbidge Rivers to receive protection.

Page 4-35 of EIS says 65 dry lakes site will receive protection through nomination and acceptance to the National Register of Historic Places.

70.2

Page 3-21 of the EIS also suggests 65 sites along a 22 mile stretch of the Bruneau River.

How many sites are there, where are they and how do you propose to protect them?

Page 14-RMP states there are 7 cultural sites in Cougar Canyon.

Page 3-21 of the EIS says there are 11 prehistoric and 1 historic site in Cougar Canyon.

How many sites are there in Cougar Canyon?

8. Multiple Use Area Boundaries

Page 56 and 59 of the RMP identify the boundary between MUA 15 and MUA 16 as the East Fork of the Jarbidge River.

Maps 3 of RMP and 1-2 of EIS show boundary between 15 and 16 as the West Fork of the Jarbidge River. They also indicate a discrepancy between the East and West Saylor Creek MUA's.

9. ACEC Boundary

Map 2-3 of EIS is not identical with the master map of ACEC in BLM office!

10. AMP's

Page 8 of the RMP states there will be 45 AMP's and 20 CRMP's implemented.

Page 2-10 of the EIS says there will be 38 AMP's developed and 8 to be reviewed.

Page F-9 (Appendix table F-4) suggests 40 AMP's to be proposed with 8 existing AMP's.

I am very opposed to language in the draft which calls for maintaining a separation of use between domestic livestock and bighorn sheep, and the statement that livestock use is incompatible with the Area of Critical Environmental Concern. I suggest to you that if such proves to be the case, after some study relative to this issue, an amendment could be written to the plan to resolve the problem. I am in favor of bighorn establishment in the canyon complex and feel this can be accomplished without any major conflicts. I can not see where drawing lines on a map and making statements that do not have a basis in fact can help the effort to establish bighorns. In fact it hinders the effort since it forces the livestock producer to come out in opposition to the transplants.

The cultural resources of Cougar Canyon are important and should not be destroyed. It is evident that the major threat to these resources comes from man himself, and there are laws on the books now to prevent the destruction of cultural sites.

I would question the name Cougar Canyon as it is not the traditional name used in reference to this canyon. Although the drainage is known as Cougar Creek, the canyon has been referred to as "Arch Canyon" for as long as anyone in this area can remember.

Reference is made on page 69 of the RMP to "Cougar Point Tuff" as it occurs in the canyon. "Cougar Point Tuff" was named by H.R. Coats(1964) for a series of welded ash-flow tuff exposed in the Jarbidge River Canyons. The type locality is Cougar Point on the East Fork of the Jarbidge River. The Cougar Point Tuff is a multiple sequence of ash flow tuffs; the number of flows deposited varies depending on paleo-topography and proximity from source. Cougar Point Tuff is not exposed below Murphy Hot Springs in the East Fork of the Jarbidge River Canyon, or approximately 2 miles above the junction of the East and West Forks of the Jarbidge River in the West Fork of the Jarbidge River. Spectacular "hoodoo's" occur in one of the cougar point tuff units in the Jarbidge River Canyon above the confluence of Buck Creek, but are poorly developed elsewhere. One of the best and most complete exposures of Cougar Point Tuff is at Black Rock Escarpment on the Bruneau River; it is not that spectacular except to a geologist.

FORAGE INVENTORY AND RESULTING ECOLOGICAL CONDITION MAP

It is obvious that the forage inventory was very general in nature and should not have been used as the basis for initial stocking for the allotments in the Resource Area. I feel past grazing use coupled with any available trend data should be utilized to determine any initial stocking or change in stocking rates. The draft is not at all clear on what the intent is relative to stocking rates. It appears that everything is based on a forage inventory that is very questionable at best. Using the old terminology to define ecological status of rangeland only serves to create misconceptions also, and I would have hoped you would use the new trend and ecological status terminology adopted by the range management profession.

RANGE IMPROVEMENTS

The acreage specified for range improvements in the RMP is not enough in relation to the total acres of poor condition range. To close the door to vegetative manipulation to improve the productive capacity of much of this range land is a big mistake.

This is certainly not a complete list of the discrepancies and inconsistencies in the Draft but maybe it will serve to point out that it is important to present a document that is consistent throughout, and subsequently more easily understood.

We have had considerable discussion relative to the Draft RMP/EIS and I appreciate your willingness to sit down and talk about our concerns. I feel there are parts of your proposal which provide a threat to a continued year round grazing program on the Diamond A. The winter grazing aspect of our operation is critical to us and this takes place in both MUA's 10 and 16. However, MUA 10 is extremely important to us in that it provides the lower country that remains relatively snow free, has abundant forage, and includes topographic features that provide protection from winter storms during calving etc.. The statement was made to me during one of the open houses that livestock grazing will have a "low priority" in MUA 10 and the Draft RMP/EIS seems to suggest the same idea.

The fact that this area is attractive to many different users of public lands, that it supports an abundant wildlife population, that the forage resources is as good or better than it was when we came here 32 years ago, and the fact that livestock grazing has continued at the same intensity for many years, should make it difficult to justify placing a low priority on livestock use of the area.

I would like to briefly summarize my position relative to several issues and proposals that have been addressed in the Draft.

WILDERNESS STUDY AREA (Jarbidge River)

I am opposed to the Jarbidge River WSA being recommended as Wilderness. The canyon complex does not need this designation to provide the level of protection needed for the area. The plateau areas West of the Jarbidge River should be excluded from the WSA for the same reasons the plateau areas East of the river have been excluded in the preferred alternative.

"The wilderness quality of these plateau areas is relatively low and these areas would have manageability problems. The plateau area has little topographic variation and is primarily in poor ecological condition. The potential for improvement in vegetative conditions is low. The plateau also contains several imprints of man. The boundary of the plateau is a road that receives vehicle use and has few natural barriers that would prevent off road vehicle use. This road, coupled with the presence of existing vehicle ways would make this area difficult to manage as wilderness." (Page 13 of RMP)

WILD AND SCENIC RIVER DESIGNATION

I am in favor of Wild and Scenic River designation of the Jarbidge and Bruneau Rivers only if the other special use proposals are dropped. Wild and Scenic would provide a level of protection against major hydro development in the canyon river system.

ACEC FOR BIGHORN SHEEP HABITAT AND CULTURAL RESOURCES

I view the proposed ACEC proposal as an effort to create conflicts that probably do not exist. Until such time as the interaction of livestock and bighorns prove to be detrimental to the establishment of a sheep population there is no need for such designation!

The RMP as written would limit prescribed burning as a cost effective vegetative manipulation tool. As far as the Diamond A is concerned there is more than 2000 acres where burning can be used to accomplish the objectives established in our CRMP. I would like to see prescribed burning left as a viable alternative without requiring an amendment to the RMP. This could be accomplished by requiring an EAR for burning along with other range improvements as outlined on page 93 of the RMP.

WILDLIFE RESOURCES

Wildlife is an important use of the range resource and certainly merits serious consideration in the RMP. It is not more important than livestock grazing however, and should not be given the primary emphasis in the plan. There are a number of factors which affect population dynamics of wildlife numbers which were not addressed and I feel they should be. For example, the decline in wildlife numbers seems to be tied exclusively to deterioration of wildlife habitat by livestock grazing and related improvements etc.. I find no reference to predation of wildlife by coyotes and raptors, or to the hatching conditions in the spring for game birds, in the draft. These factors should be given some consideration as your biologists plan for wildlife management.

The large increase in proposed wildlife numbers may have an impact on private land that should be considered. The private landholders interests seem to have been ignored in the draft.

The proposal by The Nevada Department of Wildlife to transplant elk in the Jarbidge Mountains has been addressed as a reintroduction of the species. This is questionable and should be treated as an introduction until such time as NDOW can substantiate the existence of elk in the Jarbidge Mountains at an earlier time.

In conclusion, it appears to me that many statements of fact in the Draft RMP/EIS are purely speculation on the part of Bureau. There are many unanswered questions relative to many of the issues addressed. The plan should be structured to allow the flexibility needed to make decisions and implement new techniques as new studies are concluded. The three C's approach to solving the problems of multiple use management make a lot of sense to me, and I commend the Bureau for taking this approach to solving conflicts.

Thanks again for soliciting our comments and if I can be of any further help or if you have any questions regarding these comments don't hesitate to give me a call.

Sincerely Yours,
Robert Barton

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Bureau of Land Management
Boise District Office
Gary Carson, Jarbidge Area Manager,
3948 Development Ave
Boise, Id. 83705.

Dear Sir:

Thank you for sending me your Draft Environmental Impact Statement on the Jarbidge area and other areas adjacent to it.

I am in favor of Alternate D for managing the areas as described in the Statement. I believe the course outlined under this plan would most fully protect the natural habitat and cultural resources of the areas and allow sufficient use and development in the line of recreation and agriculture.

The other plans reviewed in the Statement give greater emphasis to agricultural development through the sale and exchange of lands. Because farmers in Idaho have had problems disposing of what they raise, I do not see the need for releasing more acreage for private use. I have another concern about the increase of lands for agricultural use. Because of modern methods of farming in Idaho involving pumping water and sprinkling fields there is great risk to our underground water table. It is not only a matter of depleting this vital source but polluting it with the chemicals used in farming today. This has already happened in other parts of the country and it is a problem not only for future users of water but for existing farmers whose water supply becomes contaminated. I would like to see more studies done

on the subject of underground water.

I believe there is an increasing awareness of the scenic value of such areas as the Bruneau and Jarbidge River Canyons. A few years ago no one would have thought of considering such places as recreational sites. I am happy that we have reached a stage of sophistication which allows us to view them as places of beauty along with more conventional sites involving forested mountains and lakes.

Yours sincerely,

Julia Conway Welch
Julia Conway Welch
204 S. Florida
Caldwell, Id.
83605

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1-1-85

Dear Sir:

I would like to take this opportunity to add my input to your proposed Jarbidge Resource plan. After studying this document my reaction is one of concern. It let me begin, though, by saying I strongly support your intention of wildlife reintroduction + habitat protection. I specifically support the attempts of elk reintroduction, Cat, Big Horn Sheep habitat protection, aquatic + riparian habitat protection. As far as wildlife is concerned I would only wish that you might be more specific as to the management of the 37 miles of riparian habitat along the Snake River riparian zone. I wish to see + fully support restoring the ecological integrity of this area. As a matter of the Jarbidge-Bruneau Rivers I fully support their inclusion along w/ Sheep Creek into the National Wild + Scenic Rivers System. I believe they were nominated as potential rivers as far back as 1976. These rivers represent a unique opportunity to preserve a river system, unlike the Salmon + Selway. They are desert rivers, undisputed to date, remnants of a distant past, safe until now because of their marginal economic exploitative possibilities. My greatest concern is for the plateaus above the canyon rim. It is these high desert plateaus that need our concern and protection. This area, just 2 hours from Boise, deserves a greater acreage allotment than the mentioned 67,000 acres. This area casts as a whole system, representative plateaus on the east side of the Jarbidge River, and the plateaus along the Bruneau River and Sheep Creek need to be included. I would be distressed by a recommendation

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that created a narrow strip & without any back the possibility of immense future development engulfing its existence. Therefore I strongly support a 37,000 acre allotment with a strong emphasis on wildlife reintroduction + support rather than further agricultural developments. Thank you for considering my input for an area I value + wish

Bruce Mathew
1111 N. 1st
Boise 83702

49 Royal West Dr. #4
D. Andover, Mo. 61845
Dec. 30, 1984

Mr. Joe Zinner, Manager
Boise District, BLM
3948 Development Ave.
Boise, Idaho 83705

Dear Mr. Zinner:

This letter is written to urge your support in regards to certain lands with your jurisdiction including:

1. most crucially, help reintroduce elk in the Jarbidge country,
2. please - Will add some River status for Bruneau-Jarbidge and Sheep Creek - I have seen this area all the way to the Snake River while in the main loops - it is a beautiful area well worth being!
3. please - protect bighorn sheep habitat and in general all wildlife rather than cattle or agricultural interests.
4. Wilderness status for King Hills,
5. of course, support the 340,000 acre wilderness proposal for the Bruneau-Jarbidge and

surrounding areas.

Your help is vital in this matter!

Sincerely yours,

Butch Fore



IDAHO DEPARTMENT OF FISH AND GAME

REGION 4
868 East Main • Box 428
Jerome • Idaho • 83338

December 31, 1984

75

Gary Carson
Area Manager
Boise BLM
3948 Development Ave.
Boise, ID 83702

Re: Jarbidge River and Bruneau River-Sheep Creek Wilderness Recommendation

Dear Gary:

The Department of Fish and Game has reviewed the Draft Jarbidge RMP and EIS. Comments on the main document are being submitted to you as a separate letter. We have the following comments and recommendations regarding wilderness proposals addressed in the draft:

The plateau areas on the east side of the Jarbidge River WSA and in the Bruneau-Sheep Creek WSA have been recommended nonsuitable for wilderness under the preferred alternative. The plateaus were determined to be in poor ecological condition, and to have "manageability" problems in the form of access and conflicts with other resource uses (page 12). We believe inclusion of some plateau lands is essential to a wilderness designation on these river systems.

Both the Jarbidge and Bruneau Rivers have had recent reintroductions of California bighorn sheep. It is hoped these bighorn populations will continue to increase in numbers and expand their distribution to occupy suitable historic habitat within the river systems. Omission of plateaus in a wilderness designation may not allow adequate protection of sheep habitat and would limit management alternatives for increasing bighorn to viable population levels.

75.1

Bighorn sheep tend to avoid areas which receive frequent use by humans or concentrations of domestic livestock. Thus, reduced vehicular access and disturbance on plateaus resulting from wilderness designation, would benefit bighorns. In addition, these plateaus adjacent to the steep, precipitous, canyons provide critical foraging areas for sheep.

75.2

Most of the manageability problems could be reduced by inclusion of specific provisions for the WSA's. Management guidelines similar to those included in the Jacks Creek Wilderness EIS to enhance bighorn management opportunities and address other resource uses should be adopted. Following are provisions which should be included:

Gary Carson
December 31, 1984
Page 2

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- 75.2 1. If necessary, prescribed burns should be permitted to benefit bighorn sheep habitat and restore natural plant succession. Vegetative manipulation projects designed to increase livestock forage should not be permitted on bighorn sheep range.
- 75.3 2. Limited access by motorized vehicles to maintain existing livestock watering developments might be permitted if no practical alternative were available.
- 75.3 3. The Department's continuing program to reestablish bighorn sheep in portions of their historic range would be benefitted by a provision permitting the use of helicopters and vehicles for crapping and transplanting operations.
- 75.4 It is stated in the RMP the plateaus surrounding the canyons are generally in poor ecological condition. In the Jarbidge River WSA, "the potential for improvement in vegetative conditions is low" (page 13). However, it is likely with proper livestock management practices and possible use of prescribed burns to enhance bighorn habitat, natural vegetative conditions would improve.
- 75.5 Alternatives A and D provide for wilderness designations which would best enhance fish and wildlife values of the area, and support the Department's bighorn sheep expansion program. Another possible alternative would be a wilderness boundary that closely corresponds to identified existing and potential bighorn sheep habitat.

We appreciate the opportunity to comment on this document.

Sincerely,

Jerry M. Conley
Director

JMC:WEW:ar

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Letter page 2

1525 Halad
Boise, ID 83705
3 January, 1985

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Mr. Joe Zimmer, Manager
Boise District, Bureau of Land Management
3948 Development Avenue
Boise, Idaho 83705

Dear Mr. Zimmer:

The following are my comments to the Jarbidge draft Resource Management Plan/
Environmental Impact Statement.

Wildlife. I support the BLM recommendation for protecting Idahoan sheep
habitat as an Area of Critical Environmental Concern and think all of the
habitat should be protected including Salmon Falls Creek, the west fork of the
Jarbidge, and Sheep Creek. I also support the reintroduction of elk to the
area.

Jarbidge-Bruneau River. I support wild and scenic status for the Jarbidge-
Bruneau and Sheep Creek. I think it is particularly important to include
the west fork of the Jarbidge which forms a link in the unbroken river
ecosystem.

Grazing. I feel the amount of grazing recommended needs to be reevaluated. The
fact that 32% of the poor and fair aquatic habitat is a result of livestock
use is appalling and would suggest the need for grazing cutbacks.

Cultural and Paleontological Resources. I believe cultural and paleontological
resources deserve better protection than that recommended in Alternative C.
The Cougar Creek complex should receive National Register nomination as well
as ACEC status and the important and/or deteriorating sites should be fenced.
I support fencing for 21 sites in the Dry Lakes complex and support National
Register nominations for Juniper Ranch and Clover Creek. I also support the
BLM recommendation for ACEC designation for Sand Point and Hageman Ponds sites.

Land Transfers. The development of 84,229 acres into irrigated agriculture
provides short term benefits for only a few to the long term disadvantage
of many. Irrigated agriculture will adversely affect ecological values as well
as economic ones. The notion that Alternative C calls for electric ratepayer
subsidies of \$54.2 million or 44% of the electric costs while irrigation only
pays 14% or 4.6 million is obscene. I believe this fact alone should eliminate
irrigated agriculture from consideration.

The projected price decreases resulting from new agricultural development should
be further investigated. A 13.4% potato price decrease as suggested in
Alternative C could mean ruin to many small Idaho farmers. This, in addition to
the projected \$22.6 million net loss (ag. profits minus irrigation subsidies)
does not make good economic sense.

Wildlife suffers as a result of extensive land transfers. The food base for
wildlife will be severely restricted resulting in reduced populations in those
areas. Agricultural development cranks cattle into smaller ranges, further
impacting range and wildlife.

Mr. Joe Zimmer, Manager
Boise District, BLM
3948 Development Avenue
Boise, ID 83705

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Dear Mr. Zimmer:

This letter is in response to the BLM draft Resource Management Plan/Environmental
Impact Statement for the Jarbidge Resource Area. In reviewing this document, I
have found many shortfalls to management for these public lands. I have crossed
this area many times in my work and as a hunter and explorer. I find much of my
public property in poor condition. The Jarbidge area is a large and crucial
link in the system and I believe corrective action will enhance the entire region's
social, economic, and environmental fabric. Some of the problems I perceive are
outlined below.

Land transfers of 91,446 acres into the public domain is not shown to make either
long term economic or environmental sense, yet it is still recommended by BLM.
In the transfer of 84,229 acres to irrigation development both economic and
ecological impacts will be great. The birds of prey which rely on rodents
primarily from unirrigated lands will be pushed out. Range for wildlife will
be lost. Soil erosion will increase, choking drainages with sediments.

The water for this project would come mainly from the Snake River. BLM's
proposal advocates the use of more water on this project than is available for
use by the entire southern portion of the state in the upcoming Swan Falls
agreement. Idaho's farm commodities market limits are basically currently
saturated. The introduction of new lands would result in decreasing farm prices
and displaced production in other sectors. To pump this water from the Snake
River causes a vicious cycle of irrigation taking water from power generation
while at the same time consuming additional power for pumping. In the end all
utility consumers pay more for energy to subsidize these new projects. Interest-
ingly enough, the BLM outlines this potential devastating impact and then endorses
it in the preferred alternative.

The BLM proposes to increase grazing 66% over the next twenty years--an increase
on less land than now currently utilized for grazing. This gives livestock 92%
of the forage leaving a meager 3% for wildlife. Presently 40.3% of this range-
land is in poor condition, 9.3% is rated fair, 4.3% is rated good and only 2.1%
is rated excellent. This is atrocious.

As outlined in subalternative D, eliminating grazing will allow this now
ravaged landscape to begin to recover. However, this area is in such bad
shape the BLM admits marginal recovery in 20 to 30 years assuming no managed
range improvements are to occur.

Further failures of this program can be seen in the condition of aquatic
habitat of the region. This area has 312 miles of streams and rivers. Not
considering the Snake River, only 15 is in excellent condition, 47% is in good
condition, 23% fair and 29% poor. This situation is extremely disheartening
when 32% of the poor and fair habitat is a result of livestock abuses while,
on the other hand, the good to excellent reaches are areas with natural blockages
to livestock.

I feel the land transfers for irrigated agricultural development should be
eliminated and the other land transfers should be analyzed further.

Wilderness. The proposed acreage is not sufficient to protect wildlife and
recreational values. This area in near several population centers; it
deserves better protection. I strongly endorse the Committee for Idaho's
High Desert alternative proposal.

Summary. By recommending the preferred alternative, I feel the BLM is
promoting irrigation development of this desert land which will provide
a subsidized profit to a few developers while causing rate increases
to electricity users and commodity prices increases to farmers. I don't
feel the BLM should recommend ANY land transfers until the Snake River
water rights controversy is solved and until the full economic impact to
the farmer and wateruser in southern Idaho is understood. Please reconsider
your recommendation.

Thank you very much for this opportunity to comment.

Sincerely,

Susanne Valet
Susanne Valet

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All wildlife would benefit from the elimination of livestock from wilderness
areas. Future wildlife populations would be larger and healthier. The landscape
would offer much more natural and stable conditions truly representative of wild-
erness, not cow pastures.

The preferred alternative (C) proposes rim to rim wilderness in the Bruneau/
Jarbidge, Sheep Creek complex. Environmental landscapes do not begin and end
at the canyon walls. The upland plateau adjacent to the river valleys are
equally important. They are the hinterland of the valley. Erosion on the
plateau plugs valley streams and vegetation on the plateau is an important element
to local wildlife. By not including a corridor of lands on the rim of the
Bruneau/Jarbidge rivers and Sheep Creek, we deprive ourselves from a stable,
diverse ecosystem to a confined weak one which will be easily disrupted by out-
side influences.

Thus, it is my recommendation that the BLM adopt an environmentally stable plan
for the Jarbidge including the following corrective actions:

1. Develop a 340,000 acre alternative proposal following the boundaries
presented in the Committee for Idaho's High Desert proposal.
2. Restrict land transfers of 74,560 acres because of economic and environ-
mental impacts.
3. Phase out grazing on wilderness lands to allow environmental recovery for
the good of wildlife and wilderness landscapes.
4. Initiate some range improvements with natural vegetation on areas of poor
to fair ratings.
5. I support wild and scenic status for the Bruneau/Jarbidge rivers from
headwaters to where they emerge above Bruneau.
6. Salmon Falls Creek canyon should be managed as an outstanding natural area.
7. I support the King Hill wilderness of 29,209 acres as part of the larger
Camas Trail-Bennett Hills wilderness.
8. I support Alternative C recommendations on the Sandpoint and Hageman sites.
9. Cultural resources must be protected at all costs. If agriculture and grazing
options are not eliminated, all sites should be protected by recommendations
to the National Register, ACEC designation, and fencing to stop destruction.
10. The final EIS should investigate the economic impact of converting lands
from a predominantly grazing economy to a wildlife and sportsman dominated
economy, weighing local benefits to national and regional public benefits.

Thank you for the opportunity to help decide the future of our public lands. As
our population grows we find that we can no longer ignore our responsibilities
of ensuring a stable environment for future generations. It is one thing to
use the land for society's needs. But, to sacrifice irreplaceable lands for short
term gains at the expense of public good spells disaster. I feel that it is the
BLM's responsibility to manage public lands for not only the public good today, but
for the future. Future generations will need our public resources in good condition
to help with the challenges of tomorrow.

Dorian Duffin
1525 Halad
Boise, ID 83705

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908 N. 21st Street
Boise, Idaho 83702
January 3, 1985

IDAHO STATE HISTORICAL SOCIETY
610 NORTH JULIA DAVIS DRIVE BOISE, 83702



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Mr. Joe Zimmer, Manager
Boise District, Bureau of Land Management
3948 Development Avenue
Boise, Idaho 83705

Dear Joe,

The following comments are offered on the Jarbidge Resource Management Plan and Environmental Impact Statement (EIS).

Livestock-- The livestock increases recommended under Alternative C (the Preferred Alternative) are excessive. Wildlife populations in the resource area should be allocated a significantly larger portion of the available and potential AUM's. The 66 percent increase in livestock use levels (from 172,493 AUM's to 271,425 AUM's) is most disturbing and unsupportable especially when compared to the proposed allocation of only 3,877 competitive forage AUM's for wildlife. Such a high management emphasis for cattle production is out of line when one considers that the Jarbidge Resource Area already suffers from overgrazing in many allotment areas, has a prevalence of soils highly susceptible to erosion, and poor range conditions prevail. The BLM should be looking at reduced livestock use levels rather than increased use levels. I support the AUM allocations proposed under Alternative D and urge the BLM to adopt this strategy in lieu of those outlined under Alternative C. In recent years, the economics of range improvement projects have become highly questionable, particularly when one considers the loss of ecological, wildlife, soil, watershed, and other resource values. I simply cannot support the livestock use levels outlined in Alternative C.

Wild and Scenic Rivers-- I strongly support Wild and Scenic River designation for the Bruneau River, Jarbidge River, and Sheep Creek.

Wilderness-- Significantly more plateau acreage should be included in any wilderness recommendation for the resource area. I support the 340,000 acre wilderness proposal prepared by the Committee for Idaho's High Desert for the Bruneau-Jarbidge WSA's. Furthermore, I commend the BLM for recognizing and including the King Hill WSA in the wilderness proposal outlined under Alternative C and wish to express my support for this recommendation. Of the four alternatives outlined in the RIP, the BLM should adopt the wilderness proposal described under Alternative D. The Bruneau-Jarbidge wilderness complex is one of our Nation's astounding wilderness treasures and should be preserved for the enjoyment of future generations.

Please include these comments in the FEIS. I also would like to receive a copy of the FEIS when it becomes available. I thank you for the opportunity to comment on the Jarbidge RIP and look forward to continued participation in the development of a balanced RIP for the Jarbidge Resource Area.

Sincerely,
Steve Jakubowicz
Steve Jakubowicz

January 3, 1985

Mr. Gary Carson
Jarbidge Area Manager
Boise District Office, BLM
3948 Development Avenue
Boise, Idaho 83705

Dear Mr. Carson:

We have reviewed the Jarbidge Resource Management Plan and Environmental Impact Statement and have the following comments concerning cultural resources:

1. In the last sentence on page 14 it is stated "Special standard operating procedures and clearance procedures apply in critical protection areas." Are these procedures any different than those discussed on page 87? The procedures detailed on page 87 are an adequate description of BLM policy in regards to archaeological and historic properties.
2. Is there a schedule for completing the management plans for the historic and archaeological properties identified in the management prescription for those various MUA's (pp. 20-61; 2-21)?
3. On page 2-21 it states that 37,000 acres of public land will be nominated to the National Register of Historic Places. I believe this statement should be clarified so that livestock operators and others know how this affects their operations.

It is somewhat misleading to say that 37,000 acres will be nominated to the National Register. It would be more accurate to say that 282 properties, most of which are less than 1 acre will be nominated. The land in between these sites is of little consequence to the nomination. So what really is being nominated is less than 282 acres spread over a 37,000 acre area. Such a designation does not preclude grazing, range improvements, mining, etc. National Register Districts in the Challis area have not hindered such activities.

79.1

-1-

Mr. Gary Carson
Jarbidge Area Manager
January 3, 1985
Page 2

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4. A National Register district should also be considered for MUA 4, the Snake River Riparian Unit. Numerous important archaeological sites occur on both sides of the Snake River. A district in this area would provide recognition for the probable winter habitations of Indians who lived in the area for the last 12,000 years.

Thank you for allowing us to comment. If there are questions about our comments, please contact us (208-334-3847).

Sincerely,
Thomas J. Green
THOMAS J. GREEN
State Archaeologist
State Historic Preservation Office

TJG/rm



STATE OF IDAHO

DEPARTMENT OF LANDS
STATEHOUSE, BOISE, IDAHO 83720

Address reply to:
DEPARTMENT OF LANDS
SOUTH CENTRAL AREA
BOX 149
GOODING, IDAHO 83303
PHONE 934-5806

January 3, 1985

Gary Carson, Jarbidge Area Manager
Boise District Office, BLM
3948 Development Avenue
Boise, ID 83705

80

Dear Mr. Carson:

The Department of Lands has reviewed the Jarbidge Resource Management Plan/ Environmental Impact Statement. Our comments and recommendations are as follows:

1. On map 3 and map 1-2 "Multiple Use Areas" Sailor Creek East and Sailor Creek West unit names appear to have been mistakenly turned around.
2. No date is given for the completion of the RMP for the two Sailor Creek Allotments.
3. Land exchange to consolidate ownerships be given a high priority in the Districts planning process per the State/BLM Land Exchange strategy agreement.
4. Idaho Department of Lands needs to be involved in the early stages of management decision making involving state lands.
5. A cooperative review by the state and BLM before making any changes in exchange of use involving state lands.
6. The Department of Lands needs to be involved in the planning of range land improvements that either adjoins state or could extend onto state lands.

80.1

7. Any limitations of access for using state lands including oil, gas or mineral development may adversely affect the income to the public schools from the state lands. Therefore, prior to any restrictions on access, we request that land exchanges be pursued to provide the state with other lands of equal potential. The decisions concerning wilderness study units could be an example of this concern.

The state endowment lands were given to the State of Idaho as a source of income to the beneficiaries of the endowment i.e. the Public Schools. Since these lands are significantly intermingled with the BLM lands, most decisions made by the BLM can affect the use and income from these lands. Therefore, the Department of Lands needs to be involved in the management decisions affecting state lands. Land

exchange is a method we can use to separate the impacts of management decisions, we ask that land exchange be given a high priority.

We appreciate the opportunity to comment.

Sincerely,



HOWARD K. RESTLE
Area Supervisor

HKY:dm



State of Idaho
DEPARTMENT OF WATER RESOURCES
STATE OFFICE, 450 W. State Street, Boise, Idaho

JOHN V. EVANS
Governor

A. KENNETH DUNN
Director

Mailing address:
Statehouse
Boise, Idaho 83720
(208) 334-4440

January 3, 1985

Clair Whitlock, Director
Idaho State Office
Bureau of Land Management
3380 Americana Terrace
Boise, ID 83706

Dear Mr. Whitlock:

I appreciate the opportunity to review and comment on the draft Jarbridge Resource Management Plan and EIS Statement. I also appreciated the briefing that Mr. Gary Carson and other members of your Boise District staff provided recently for the Water Resource Board on this matter.

The plan as ultimately implemented will have a significant effect on the quality of life in the area and throughout the state. While it is important to recognize and protect recreation, wildlife and cultural values in the area, it is also important to provide for the continued economic growth of southwestern Idaho. I understand that the preferred alternative, "Alternative C," is an effort to balance these competing uses; and from that standpoint, I believe the preferred alternative most comports with state water policy.

While Alternative C provides for a level of ag development that is substantially in accord with that estimated by the Swan Falls Advisory Committee, and over the 15 to 20 year life of the RMP, it is supportive of the State Water Plan, I am concerned that specific aspects of the plan may prevent the realization of the development level offered. Designation of boundaries for the Sailor Creek wild horse herd, Salmon Falls Creek as a natural area, the Oregon Trail segments as an area of no disturbance, and the Sandpoint Paleontological Site will directly prohibit development of some irrigation projects or seriously affect the economic feasibility of other projects. The proposed boundaries for the Sailor Creek wild horse herd area encompasses all or part of a number of Carey Act filings. The area would also cover two potential reservoir sites (Grindstone Butte and Sailor Creek) designated in Policy 21, State Water Plan and the upper areas of Rosevear Gulch Reservoir site. The route for a canal to provide Snake River water diverted upstream at Milner

Clair Whitlock, Director

- 2 -

January 3, 1985

also traverses the proposed wild horse area. While there are no significant ongoing efforts to develop these lands, reservoirs, or canal routes, it is important to Idaho's economy to keep the options open for development when it is needed. Any section to designate the wild horse area should include recognition of these values and provide for review and change of the designation upon request by the state of Idaho.

Similarly, the designation of the full 30 mile stretch between Balance Rock Road and Salmon Falls Dam on Salmon Falls Creek as a natural area will present an obstacle to future development of the Brunau Plateau. A siphon to allow Snake River water diverted at Milner to cross Salmon Falls Creek may be the only means of economically developing, and perhaps of retaining existing, irrigated areas. Any designation as a natural area should include a recognition that the designation will be reviewed upon request to allow identification of a suitable siphon crossing upon the request of the state of Idaho.

The descriptions of the impacts of each EIS alternative gives an indication of the water required for irrigation development (see pages 4-1, 4-27, 4-42 and 4-56). The EIS applies a statutory maximum diversion rate to each acre developed which results in a significant overstatement of the diversion rate likely to occur at any one time. The actual diversion rate will depend upon the design of the projects and administrative constraints placed upon their operation. The volume of water depleted from the river system as a result of irrigation development is the proper way of describing the impact rather than listing a hypothetical diversion rate.

As an example, the water requirements for Alternative C is listed on page 4-42 as 1701 cfs. This would seem to require 26 percent of the typical August low flow at King Hill (refer to table 4-3 on page 4-16). The volume depleted if Alternative C were fully developed would be 198,000 af per year. If this amount were depleted from the stream uniformly over the entire year, the reduction would be 274 cfs or about four percent of the typical August flow.

While it is unlikely that all developments will yield a uniform year round depletion, the proposed Swan Falls Agreement will raise the level of the minimum flow to be maintained at Murphy and would restrict off stream-off season diversion to storage from the main stem of the Snake River. These requirements will force the developers to design and operate, and the state to only allow, projects which minimize the reduction of both summer and winter low flows. Use of ground water and storage obtained upstream from Milner Dam will be likely methods of meeting this challenge. For this reason, the actual impacts on Snake River flows will be significantly less than that suggested on either page 4-16 or page 4-42. This also underscores the importance of making provisions for the canal and siphon crossing at Salmon Falls Creek and the Sailor Creek wild horse area to allow some flexibility in procuring water supplies for new developments and perhaps for maintaining existing developments.

The economic evaluation of developing irrigated lands presented on page 4-54 represents a substantial change from that presented by BIM on page 8-36

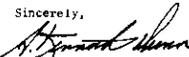
Clair Whitlock, Director

- 3 -

January 3, 1985

of the Ag-EIS published in 1979. Further, the conclusions drawn regarding overall costs and benefits in developing ag lands do not track with studies made by other economists in response to the Swan Falls controversy. The documentation and discussion of assumptions are not sufficient in the EIS to allow a detailed review of the economic section.

This department and the Water Resource Board have been assured by members of your staff that the plan, even when adopted, is not cast in concrete and can be reviewed and changed as necessary to allow state objectives to be met. I encourage you to provide for expediting such reviews as you adopt the plan and any specific designations provided for in the plan. Thank you again for the opportunity to comment on the RMP-EIS.

Sincerely,

A. KENNETH DUNN
Director

AKD:alw

cc: Martin Zimmer, Boise District Office
BIM

83

Jan 2, 1985

Mr. Joe Zimmer, Manager
Boise District, BLM
3948 Development Avenue
Boise, ID 83705

Dear Mr. Zimmer:

I suggest, therefore, the con-
servativists' 346,000-acre wilderness
proposal for the Bruneau-Jarbridge and
the surrounding plateau. They should
be reserved for future generations.

I also suggest wilderness for
King Hill.

I urge protection for all Pog-
son sheep habitat including salmon
falls creek & the East Fork of the
Jarbridge. I am very concerned
about soil erosion & bare ground &
animal protection.

Jonathan H. Marvel

83

status of the Bruneau-Jarbridge &
Jarbridge East Fork should
be preserved as an unbroken whole
with wilderness river description
extending from Nevada Jarbridge
watershed to the Snake River
watershed. King Hill is in
Jarbridge County. The road from
King Hill is a very good & famous
road. Do not wish to pull away
from surrounding wilderness because
of our already stressed
resources!!

I am an active member of
the Bruneau-Jarbridge Audubon Society
& I am sure that our town
is privileged to see beautiful views
of the Bruneau-Jarbridge area
& I am very worried about the
BLM's RMP/EIS, under which our
views would be destroyed.

Thank you!!

Margaret O. Pratt

JONATHAN H. MARVEL A.I.A. ARCHITECT

84

CROY STREET EXCHANGE • SUITE L
P.O. BOX 1602 • HAILEY, IDAHO 83333 • (208) 788-2290

January 3, 1985

Mr. Joe Zimmer, Manager
Boise District BLM
3948 Development Avenue
Boise, Idaho 83705

Dear Mr. Zimmer:

I am writing to comment on the Draft Resource Management Plan
and Environmental Impact Statement for the Jarbridge Resource
Area. I have spent a considerable amount of time in the last
six years exploring parts of the Jarbridge-Bruneau River area
both on the rivers and the surrounding plateau country. This
area is a truly extraordinary landscape and deserves the fullest
protection possible under Federal Law. I strongly recommend
the you propose inclusion of the whole Jarbridge-Bruneau drainage
in the National Wild and Scenic River System. This protection
should extend to the West Fork of the Bruneau below Rowland
Nevada, the east fork of the Jarbridge, and to those parts
of the East Fork of the Bruneau where feasible. Protection
should be recommended for the Bruneau mainstem all the way
to the confluence with the Snake with perhaps lesser designation
for the ranches near Bruneau. In order to fully protect
this remarkable river system I strongly suggest an enlargement
of the total area recommended for wilderness designation to include
much larger areas above the rim on the plateau. It is suggested
that the plateau areas except for that west of the Jarbridge
represent a management problem because of existing ways or adjacent
roads. My experience has been that posting of land is often
sufficient to keep most motorized travel off designated lands.
Certainly use of ways could be cut without great management
costs. The high desert plateaus are a valuable wilderness type
not presently represented in protected areas. I strongly support
fencing out cattle from damaged riparian areas of the watershed.

Of the four alternatives studied only the alternative D approaches
what I would consider adequate consideration for the protection
and restoration of resources. In fact I would suggest much greater
emphasis on resource restoration over development. No where in
the Draft or EIS is there mention of costs relating to the re-
commended course of management. The final draft should include
a cost analysis of all of the alternatives studied.

JONATHAN H. MARVEL A.I.A. ARCHITECT

84

CROY STREET EXCHANGE • SUITE L
P.O. BOX 1602 • HAILEY, IDAHO 83333 • (208) 788-2290

2.

I am opposed to all but minimal land transfers for private
agricultural development. The costs of these developments
historically, and now even moreso, exceed their cumulative
benefit for the general public.

I favor the wilderness designation of the King Hill study
area, and I strongly support Area of critical environmental
concern designation for all Desert Bighorn Sheep habitat
not protected by wilderness designation.

I strongly support fencing or other necessary protection
for archeological sites within the study area which have
been or may become damaged by cattle. This protection should
be carried out insofar as possible so as not to attract attention
to these special resources.

I support management decisions premised on the enormous value
of our natural resources in their pristine or restored state
and of wildlife and fisheries managed to regain their former
health and numbers. Resource extraction values, even when grossly
overvalued, cannot begin to compare with the wilderness value
which now exists in the Bruneau watershed and in no way could
compare with the restored wilderness values which could be
achieved.

Very truly yours,

Jon Marvel

Jon Marvel



American Wilderness Alliance

1900 East Evans Avenue, Suite 8-D Denver, Colorado 80202 (303) 758-5816

Mr. Martin Zimmer
Boise District Manager, BLM
3948 Development Ave.
Boise, Idaho 83705

Dear Sir:

As the Idaho Representative of the American Wilderness Alliance I wish to comment on the draft RMP/EIS for the Jarbidge Resource Area.

We support the Committee for Idaho's High Desert's proposal for 340,000 acres of wilderness surrounding the Brunau-Jarbidge drainages, the surrounding plateau country, and for a 29,200 acre King Hill wilderness in the Bennett Hills. The Great Basin Desert is not adequately represented in wilderness anywhere in Nevada, Utah or Idaho, so these areas will assist towards protection and representation in this unique ecosystem. Furthermore, they will add towards further fish and wildlife habitat, and be an asset to sportsmen and fishermen from Jackpot, Nevada, Twin Falls, Burley, Bushi and other parts of Magic Valley and Hagerman Valley.

We also support additional protection for Salmon Falls Creek, the Hagerman Fossil Area and the 1000 Springs area - all of which were studied by the National Park Service in the mid-1970's and were acknowledged to be of national significance. They should be classified as wild and scenic rivers or scenic area. The bighorn sheep habitat needs further enlargement in the Jarbidge/Brunau River drainages, Sheep Creek and Salmon Falls Creek.

It would be prudent to introduce elk in the Jarbidge area thus adding another big game species for sportsmen from Jackpot, the Magic Valley and other southern Idaho and northern Nevada residents.

Sincerely,
Paul Fritz
Paul Fritz

Working Together to
Conserve Wild America

85

Box 1772
Boise, Idaho 83721
January 2, 1985

86

SEE ATT.
Jan. 2, 1985

Dear Sir:

Just a short note here in support of the CIHD proposal for the future of the Jarbidge - Brunau area. Why is it so impossible to manage the entire area as if it were a wilderness area, no further developments, no further grazing or mineral permits, etc.? So what if this doesn't consider the ranchers and developers? Big deal. Economics doesn't have to be a factor either. Give nature and the wilderness advocates a chance, see how long it takes for us to mess up the area.

In any case, I'm hopeful for the designation of the Brunau & Jarbidge rivers as wild and scenic. These corridors will continue to run water whether the plateaus are developed or not.

Martin McGregor

Martin McGregor
6261 Ben Air Drive
N. Jordan, Ut. 84084

88

December 31, 1984

Mr. Joe Zimmer, Manager
Boise District, BLM
3948 Development Avenue
Boise, ID 83705

Dear Mr. Zimmer:

I am writing to support a desert wilderness in excess of 340,000 acres for Jarbidge Resource Management Area. The 340,000 acre wilderness that I support would most nearly correspond to the alternative proposal being presented by the Committee for Idaho's High Desert.

I am a Southwestern Idaho desert enthusiast and have floated the Brunau several times. In addition, I have hiked in the West Fork, East Fork and Sheep Creek drainages. I believe it is not only important to continue pursuing Wild and Scenic status for the Jarbidge and Brunau Rivers, but the plateau areas in the Management Area need to be managed to properly acknowledge suitable rangelands for wildlife habitat. It is past time to begin to phase in a non-subsidized plan to manage rangelands in this area as well as all Western federal grazing lands.

I believe it is important to strike a compromise in considering wilderness for the Jarbidge Management Area and I believe a compromise definitely includes considerable more acreage than just rim-to-rim wilderness status.

Sincerely,

Grant Simonds

Grant Simonds
P. O. Box 2534
Boise, ID 83701



SIERRA CLUB
MIDDLE SNAKE GROUP
Box 552 Boise, Idaho 83701

89

To: Martin J. Zimmer, Manager
Boise District BLM
3948 Development Av
Boise, ID 83705.

Subject: Jarbidge RMP Draft.

- 1) The Jarbidge Resource Area currently has 48.3% of its land in Poor ecological condition, only 2.1% in excellent, 4.5% in Good. We do not feel that an RMP that fails to aggressively attack this problem can be considered adequate. your preferred alternative proposes to increase the cause of this unacceptable condition - Grazing. The only reduction in "poor" condition range comes from increased "seedings". We do not feel lands converted to seeded pastures can be considered multiple use lands.
- 2) We applauded your proposal to improve riparian zones by protecting them from grazing. We suggest the number of miles be increased to 75
- 3) We are concerned about the ecological impact of your proposed land sales. Conversion of range to farm will increase grazing pressure on the rest of the range - especially if total AUM's are increased. We also feel these areas proposed for sale have important wildlife values - values which will not be made up elsewhere.
- 4) We support your recommendation for wilderness for the King Hill WSA. We support your recommendation for wilderness for the Brunau and Jarbidge Canyons. We oppose your proposal to treat the plateaus near these canyons as unsuitable for wilderness. We propose you adopt the CIHD proposal of 340,000 acres for the Brunau/Jarbidge and surrounding Plateaus.

5-52

... To explore, enjoy and preserve the nation's forests, waters, wildlife, and wilderness ...



SIERRA CLUB
MIDDLE SNAKE GROUP
Box 552 Boise, Idaho 83701

89

Tarbridge/RMP/EIS

- 2 -

- 5) We feel the Brunson-Tarbridge and Sheep Creek are Wild and Scenic Rivers. They should be protected as such. It is important to include the East Fork of the Tarbridge in protected areas.
- 6) We support the reintroduction of Elk in the Tarbridge country and where ever else they have been driven from their range.

We feel the Tarbridge Resource area has wildlife potential far beyond the current or proposed levels. We recommend BLM seek a wildlife enhancement alternative as a monument goal.

Thank you,
Charles C. Gaden
Conservation Chair.

... To explore, enjoy and preserve the nation's forests, waters, wildlife, and wilderness ...

90

The Desert Entry development in the State of Idaho under the direction of the State Water Resource Dept. and I'm in favor of allowing the entry to be fully developed. To do otherwise is being unfair to the public and takes away the privileges of private citizen and the individual farmer.

Sincerely,
Martha E. Gungler
Route #3 Box 309
Buhl, Idaho 83316

January 3, 1985
Buhl, Idaho

Bureau of Land Management
Mr. Gary Carson,

90

Dear Sir,

In regards to the Tarbridge Resource and Management Plan and Environmental Impact Statement Draft, dated August, 1984; I strongly oppose the Wild Horse Act.

If the law requires that it be maintained at all, then I am in favor of maintaining only a minimum herd and on a minimum amount of land, West of Saylor Creek only.

I am not in favor of a "Wild and Scenic Rivers" designation along the Salmon Falls Creek Canyon or in the Tarbridge, Brunson river area.

I am not in favor of expanding the "Birds of Prey" habitat.

The B.L.M. agreed to allow the

Jan 3 1985
Buhl, Idaho

91

To the B.L.M.,
Mrs Gary Carson,

Dear Sirs,

Regarding the Tarbridge Resource & Mgt Plan and Environmental Impact Statement Draft dated Aug 1984;

I am not in favor of the wild horse act. If the law requires that it be maintained then I am in favor of maintaining only a minimum herd & allowing the wild horse herd west of Saylor Creek only.

I am not in favor of a wild & scenic ^{river} designation along the Salmon Falls Creek Canyon or in the Tarbridge, Brunson river area.

I am in favor of allowing the Desert Entries to be fully developed. The B.L.M. agreed to allow D.E. development in the State of Idaho under the direction of the State Water Resource Dept. To do otherwise is totally unfair.

I am not in favor of expanding the birds of Prey habitat.

I am not in favor of the B.L.M. imposing their will upon the Public & taking away our privileges as private citizens.

Sincerely,
Wade Davigley
RT3 Box 309
Buhl, Idaho 83316

Devil Creek Ranch
Rogerson, Idaho 83302
January 2, 1985

Martin Zimmer
District Manager, Boise District Office
Bureau of Land Management
3948 Development Avenue
Boise, Idaho 83705

94

Dear Mr. Zimmer:

I would like to comment on the Jarbidge Resource Management Plan and Environment Impact Statement on behalf of the "71" Livestock Association. This association was formed in 1917 for the purpose of bettering conditions on the range and our motive in 1985 is no different. The "71" Association has been proud of the working relationship with the government agencies involved in this organization. It is with this thought in mind that I address the following issues.

In general, we feel that this draft is very poorly written. It appears that insufficient time and/or manpower were available to do an adequate job, resulting in a haphazard form that is hard to decipher.

We feel that the forage inventory and ecological conditions of these lands are not as accurate or complete as they should be. There are some cuts in grazing with ecological status rated as excellent. Then, in complete contrast, you advocated an increase in AUMs where the conditions were listed as poor. You have not used native grass as a vegetative cover in some areas which we feel should be one of the most important criteria. You have classified many acres of this ground listed as in poor condition in a main-tain condition.

We question how the Bureau of Land Management can be land managers if they are not managing the lands for the betterment for all the users involved, whether it be for wildlife, recreation, grazing, etc. Improvements in some of the multiple use areas are almost non-existent. We feel that it is next to

impossible to look down the road twenty years from now to analyze the needs or the amount of money allotted for range improvements. We believe that the public lands issues should be assessed, evaluated, and acted upon as the needs arise. You have implied that range improvements have benefited only the livestock grazing. We, in the grazing association, take objection to that theory. Range improvements have been fruitful to all users and will continue to be in the future.

We feel that land owners should have more input on assessing the number and species of wildlife in the Jarbidge Resource Area because a good share of their prime habitat involves private lands. We are very opposed to the alloca-tion of feed for the proposed introduction of elk in the Jarbidge Wilderness Area of Nevada. We also oppose Wilderness, Area of Critical Environment Concern and Recreational Area Management Plan in the resource area. Wild and Scenic River status will protect the canyon complexes, which are the only lands that should be considered for the above.

Other concerns need to be addressed in your draft. They include Riparian, Aquatic Habitat, and Culture Sites.

The "71" Livestock Association goes on record as opposing this draft as it is written and recommend that all users of public lands be a driving force in writing the final draft. We appreciate the opportunity to respond to the Jarbidge Resource Management Plan.

Respectively yours,

Randall Brewer

Randall Brewer
President - 71 Livestock Association

U. S. SMITH CO. COMPANY, 2722 ARHIGHT WAY, BOISE, IDAHO 83725, (208) 342-8194

Page 2

96

LAND & LIVESTOCK DIVISION
Headquarters

January 4, 1985

RECEIVED
SECTION 100

96

Bureau of Land Management
Boise District

Martin J. Zimmer
Boise District Manager
Bureau of Land Management
Boise, Idaho 83705

Re: Jarbidge Resource Management Plan and Environmental Impact Statement

Dear Joe:

Please review the following comments on the draft Jarbidge RMP/EIS. The comments are submitted on behalf of Simplot Livestock Company to be included in the official record.

A tremendous amount of material has been presented in your draft document. I will identify those points of major error which need modification or clarification.

- 1. The most disturbing data of the document is the forage data presented on Table F-4 of the Appendix (Allotment Summary). Glaring mistakes are given on this table. These errors shed doubt on all the forage data presented.

Very little information is given on how the forage data was developed. It is obvious that the persons or the methodology used to develop AUM's of production on a given allotment were in error. First hand knowledge of many of the allotments and their production are so far out of line that I can not accept these figures as accurate. A case of point is Simplot's Blackrock Pocket allotment located on the Diamond A. This particular allotment was seeded several years ago following a large range fire. Our present grazing use occurs in the fall from 9/15 to 11/30. With this season of use and the amount of developed forage in the allotment, present utilization is running at less than 25%.

The forage table indicates a 1% increase in 20 years. Existing demand could easily double and stay within the guidelines of your forage utilization. An error of this magnitude reaffirms my doubt of all the forage data presented.

- 2. An additional point is under the multiple use area descriptions. All 16 MUA's identify under Actions, Section II proposed projects to be implemented to accomplish 20 year goals. Identifying specific numbers of miles of fence and pipelines and specific numbers of acres of brush control is a poor way of describing your future management.

96.1

When you consider, for example, that the Saylor Creek Unit has not yet been allotted, it is impossible to envision all range improvement projects needed to implement future Allotment Management Plans. Would it not be better to identify the need for additional improvements and analyze the improvement practices?

Specific miles and acres are a guess at best and should not be a limiting factor in developing the best AMP possible for a given allotment.

- 3. The RMP/EIS also includes a large wilderness recommendation. The wilderness recommendation overlaps a National Wild and Scenic River System recommendation. Both wilderness and wild and scenic proposals are overlapped with ACEC and SRMA proposals.

The RMP states in the text that BLM supports Wild and Scenic Classification. Overlapping with wilderness, ACEC, and SRMA is unwarranted and not the desire of the people of Idaho. Those acreages which fall outside Wild and Scenic designation can be effectively managed under existing land use plan decisions, without special designation.

Should your wilderness proposal remain in the final document, additional information must be included.

Our company owns private land located in the Bruneau Canyon at Indian Hot Springs. Your wilderness maps do not identify this private land and there is no discussion of your proposed actions to the private landowner. The crossing at Indian Hot Springs is also critical for movement of livestock from the Bruneau R.A. to the Jarbidge R.A. Limited cattle use occurs at this site and should be recognized in the document.

The table lands west of the Jarbidge River should not be included as potential wilderness. The area doesn't meet the criteria for designation and could not be managed as wilderness in the future.

This area is also very important winter range for livestock. Restrictions on use and access could destroy the economic base of the Diamond A Ranch.

96.2

As I mentioned, the table lands west of the Jarbidge do not meet the criteria for wilderness. A major reason is the fact that the primary flight pattern for Air Force jets using the Saylor Creek Gunnery Range is above this area.

Continual daily low level flights occur across this table area. Solitude on the plateau is interrupted constantly by the high noise level. Any wilderness values which may exist are found only in the canyon bottom, not on the flat plateaus.

- 4. Fencing streams to improve riparian and fisheries habitat is very costly and the annual maintenance required to keep these projects operational are also very time consuming. Most fences along and across streams must be maintained every year. Facilities installed in other

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resource areas are good examples of BLM's lack of funding and manpower to adequately maintain these types of projects.

A much better approach to improving streams is developing AMPs which include grazing systems designed to meet your objectives would be a much more practical method of stream and fisheries improvement.

An interesting point to consider is on your Riparian Habitat Map 3-6. Many miles of the Bruneau and Jarbidge Rivers are identified as poor and fair habitat. No livestock use has occurred in these canyons for the past 50 years. Is removal of livestock the answer to the problem or are other factors contributing to these poor ratings?

Many serious errors were found in this draft document. Errors that must be corrected before you proceed with a final document. The most disturbing is your forage data. A first hand knowledge of the entire resource area and the present production found on these lands are not reflected in your draft document.

Your ecological condition rating is very misleading. I assume your condition ratings were developed along with the forage data. Inadequate data and a lack of time to observe the area in question has resulted in information which does not represent the present situation.

The resource base south of the Snake River has shown a tremendous improvement in the past 20 years. This area is certainly the most productive range site in the State of Idaho. Considerable private and federal funds have been invested along with the personal conviction of the livestock operators using these lands to improve them. Your document fails to recognize the progress made. This range resource is one of the best and will continue to improve.

Sincerely yours,

Frank L. Bachman
Frank L. Bachman
Simplot Livestock Company

FLB/jc



AGRI-LANDS WEST
FARM AND RANCH REAL ESTATE
LAND AND LIVESTOCK CONSULTANTS
8925 State Street
Boise, Idaho 83703

99



Office 208/336-5511
Home 208/344-2962

January 4, 1985

Mr. Joe Zimmer, District Manager
Boise District BLM
1948 Development Ave.
Boise, Idaho 83705

Dear Joe:

Enclosed is a critique offered by the "71" Association in regards to the Jarbidge Resource Management Plan and Environmental Impact Statement.

We feel that the document contains many errors and many decisions will be made concerning ranchers (permittees) livelihoods based on erroneous base line data.

The points that we feel are in error and need changed are in the enclosed context. Points that should be addressed are:

1. The main concern that the chart regarding the inventory (F-9 through F-11) is totally erroneous and the entire chart should be abandoned.
2. The area will be monitored, therefore this will depict the total number of acres of brush control, number of miles of fences, reservoirs, pipelines, wells and other range improvements.
3. We must point out that there is one allotment that has had Soil Conservation Service personnel do a weight estimate clipping on it. It showed that there was excess AUMs. The BLM should have taken the more exact data into consideration than the general ocular reconnaissance method in determining the carrying capacity.
4. The "burns" stated in the EIS were designated as burns instead of given a rating as other seedings or areas were rated. The age or condition of the burn (seeding) was not taken into consideration.
5. Another important item that was inadvertently left out was the amount of private land involved and the amount of AUMs for wildlife that is harvested annually. An inventory of the AUMs consumed by wildlife is necessary.
6. The so-called band or critical winter range for deer changes as the severity of the winter develops. The deer move up or down as the snow deepens or melts.



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Page 2

7. In some areas the dense canopy of sagebrush eliminates any new establishment of forage or grass species even though rested from livestock use. These areas should be reseeded, sprayed or have some range treatment of some kind.

8. The EIS states that 800,000 acres are in poor grazing condition. The critique teams know that this is an erroneous statement and should be changed.

9. The EIS states that certain areas should not be used when the antelope are fawning. This should not apply to grazing as the permittees need to be in the area at this time to supervise the management of their livestock.

10. The livestock permittees are against any more wilderness areas.

11. The "71" Association is against the establishment of an elk herd in the Jarbidge Mountains.

We hope that you take these points into consideration when you rewrite the final draft of EIS.

Sincerely,

Tom Blessinger

TOM BLESSINGER
Land Consultant for
"71" Association

OFFICIAL COMMENTS

SUBMITTED BY

"71" ASSOCIATION

REGARDING

JARBIDGE RESOURCE MANAGEMENT PLAN

AND

ENVIRONMENTAL IMPACT STATEMENT

Prepared by:

TOM BLESSINGER

NOTE: In the interest of reducing confusion and conserving space and because of the voluminous comments received in letter 99 relating to issues other than wilderness, only those comments relating to the wilderness issue in letter 99 have been extracted and reprinted below.

Comment letter 32 is substantially the same as comment letter 99 and has not been reprinted.

The wilderness issue related comments contained in the summary of comment letter 32 and 99 are as follows:

SUMMARY

1. The livestock permittees are against any more wilderness. Wilderness areas remove land from production. The three users (agriculture, logging, mining) of natural resources will suffer if more land area is removed from production.
2. The Jarbidge and Bruneau Rivers are presently being considered as Wild and Scenic - the livestock permittees would like it if they fell under the scenic category.

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COMMENTS BY
IDAHO CATTLE ASSOCIATION
ON
JARBRIDGE RESOURCE MANAGEMENT PLAN
AND
ENVIRONMENTAL IMPACT STATEMENT

TO
BOISE DISTRICT OFFICE
BUREAU OF LAND MANAGEMENT
1948 DEVELOPMENT WAY
BOISE, IDAHO

JANUARY 4, 1985

I am Dave Ravens, Executive Vice President of the Idaho Cattle Association, located at 2120 Airport Way, Boise, Idaho. On behalf of the Idaho Cattle Association, I would like to submit these comments regarding the Draft Jarbridge RMP & EIS.

WILDERNESS DESIGNATION The Idaho Cattle Assn. has a long standing policy opposing additional wilderness designation in Idaho. This policy was reaffirmed at the annual business meeting in Boise, November 19, 1984. It is the belief of the ICA that the current 3.86 million acres of wilderness designation is more than adequate and that other lands which are tied up in wilderness study should be released for multiple use management under which all interested can use and enjoy these lands rather than having more lands set aside for enjoyment by a few.

MULTIPLE RECREATIONAL USE & ACEC The Idaho Cattle Assn. is opposed to any designation such as Special Recreational Use or Areas of Critical Environmental Concern which would tend to create a dominant use for a few persons rather than a multiple use management system.

ICA has indicated willingness in the past to compromise on a Wild and Scenic River designation, provided the language was permissive enough to allow the general use of all users. We feel that all uses should be shared in a mutual use arrangement and that conflicts should be handled on a case by case basis.

INTRODUCTION OF ELK IN JARBRIDGE MOUNTAINS & WILDERNESS AREAS The ICA adopted strong policy at the annual meeting held November 19, 1984, opposing the introduction of elk herds in the Jarbridge Mountains and Wilderness areas of Nevada and Idaho. It is the belief of the ICA that there is not adequate suitable habitat to support elk numbers being projected by the Nevada Fish & Wildlife Dept. on the mountain areas. This shortage would create critical competition with domestic livestock for fall and winter range and degradation to stocked hay belonging to local livestock owners.

WILDERNESS PROVISIONS FOR RANGE IMPROVEMENTS ICA believes that unrestricted range improvement is absolutely essential to the future of good range management and wildlife habitat. There is generally adequate climate and economic barriers that curtail range improvements without being restricted by regulation. With all the excellent range improvement work done in the Jarbridge resource area, especially the Horse Creek area, it is very difficult to accept the figure of 800,000 acres being rated in poor ecological condition. If this is a confirmed figure it is totally unrealistic to restrict future range improvements to any figure. The projected 800,000 acre range improvement restriction over 20 years should

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THE WILDERNESS SOCIETY

NORTHERN ROCKIES REGION

January 4, 1985

Martin J. Zimmer, Manager
Boise District - Bureau of Land Management
1948 Development Avenue
Boise, Idaho 83705
Re: Jarbridge DRMP/DEIS

The Wilderness Society supports BLM's recommendation for Wild and Scenic River designation for the Bruneau and Jarbridge Rivers. We also support designations of ACEC for Hagerman Paleontologic Area; Sand Point Paleontologic, Geologic and Cultural Area; and the Bruneau/Jarbridge Rivers. We also support SRMA designation for Salmon Falls Creek and Canyon areas. These special management categories are by themselves inadequate to protect the natural resources found in the respective areas but our overall proposal provides wilderness designation for these areas as well. We support a 340,000 acre alternative that would include the 208,833 acres of Alternative D and the companion management plan but would also add 131,167 acres in wilderness on the Bruneau River and Sheep Creek, the plateau on the east side of the Jarbridge River, and the State-line Units under appeal. Claims by the BLM that the wilderness values of the plateau areas were not sufficient to warrant the cost of wilderness management were not substantiated in light of the importance these lands have in the overall ecosystem. We believe they should be included in wilderness designation.

The WSAs all provide over 97% natural appearance, exceptional scenic quality, crucial habitats for mule deer, elk, bighorn sheep, raptors, and other species, 130 miles of major and tributary canyons, outstanding opportunities for recreation, and many non-market benefits as well. They possess significant ecological and scientific values and can be reached within three to five hours driving from Idaho's major population center. The BLM recognizes that wilderness characteristics exist on all 208,833 acres yet recommend only 45% be protected as wilderness. The salt desert shrub ecosystem, although proposed for protection in other wilderness study areas, is not represented in the national preservation system and is excluded from the Preferred Alternative.

The Wilderness Society strongly objects to selection of the Preferred Alternative C for the Jarbridge DEIS and DRMP. Our objections are based on a number of serious flaws in the economic analyses,

102.1

be totally eliminated or dramatically expanded so that those lands suitable for improvement could be improved whenever favorable climate and economic conditions exist.

RIPIARIAN AREAS ICA is strongly opposed to the fencing or other unnatural protection of these areas. It is the belief that good range management will adequately protect these streambeds that traditionally run water only six - eight months of the year.

INCONSISTANT FORAGE INVENTORIES ICA members who are also permittees in the Jarbridge area feel there is definitely some error in the forage inventories as stated in the draft proposal. ICA recommends re-evaluation of these inventories and necessary adjustments be made to realistically reflect true forage resources, and that forage inventory should be an ongoing process aided by a systematic monitoring process to chart production.

DOMINANT RANGE USE ICA does not feel that any special use should be given priority over all others. In the draft proposal there seems to be a tendency to give wildlife priority for use and expansion over domestic animal utilization of the forage. It is our belief that wildlife utilization should be a part of the multiple use management program and that no special use should be allowed to have dominant use of the range.

Thanks for the opportunity to express our concern.

Respectfully Submitted,

IDAHO CATTLE ASSOCIATION

Dave Ravens
Dave Ravens,
Executive Vice President

what we perceive to be conflicts with legal mandates, divergence from goals and guidelines established by BLM, negligence to serve the public interest, and lack of balance in multiple use of the resource. The BLM consistently refers to utilization of resources that compete with agriculture, grazing, timber harvesting, oil and gas, and ORV recreation as non-commodity uses and uses that must be protected. We perceive these uses, such as water quality, air quality, hunting, fishing, hiking, photography, existence, beauty, scientific and scenic, to reflect commodities or assets that are real and have compelling and economic values. These documents do not recognize these resources with equal weight or even in the same (economic) terms as grazing, agriculture and so forth. Reliable values are available and could have been incorporated into the many comparisons but they were not thus we believe the studies have a skewed design as well as erroneous conclusions. Specifically, the documents state that the economic benefits of recreation are not incorporated in the economic analyses of the various alternatives yet these comparisons are set forth as possible economic scenarios for the alternatives. The cumulative net values cannot be considered at all reliable in light of these major omissions. Available data on the present net values of wildlife were also omitted. Additionally, the BLM states their position that "...any capitalized value associated with grazing permits has no legal basis..." yet the DEIS incorporates capital values of permits throughout the comparisons of alternatives. The economic scenario is again dramatically skewed, and actually misrepresents the values of the alternatives and the public resources. We believe that if these flaws were corrected our proposal would have even greater evidence of support. Without the corrections in economic analysis, Alternative C still remains an economic disaster.

The DRMP states that "BLM will ensure that any management action undertaken in connection with this plan is cost-effective and takes into account local social and economic factors. Cost-effectiveness may be determined by any method deemed appropriate by the Bureau of the specific management action involved." It is clear that the Preferred Alternative looked only at local factors. National interests and even regional interests are burdened with employment reductions and colossal financial burdens as well as degradation and irretrievable loss of the resource. It is inappropriate for such a parochial perspective to dominate the selection of an alternative. These are national public lands, not state or county lands, and their significance extends nationally. Determination of cost-effectiveness by any method deemed appropriate is an inadequate accounting. It should be presented for public scrutiny.

As mentioned earlier, the two major development, consumptive activities promoted by the Preferred Alternative, grazing and farming, create incredible financial losses to the public. (It should be noted here that Alternative D allows for expansion of both agriculture and beef production.) Below-value pricing per AUM results in public losses of monumental proportions. Deficit grazing programs are being reevaluated on the national level in numerous arenas and until a sound course of action is settled such massive increases in the grazing program in this resource area should be curtailed. In addition to the subsidy issue is the pervasive degradation of the natural environment and all the life it supports. Certainly a cautious increase in grazing is the best use of this resource at this time.

of the forage initially, and wildlife would be left with a paltry 34. This hardly represents multiple use and is certainly contrary to the intent and language of public law. The DRMP/DEIS consistently treats grazing on public lands as a right rather than a privilege. Only under the most compelling circumstances are grazing developments modified to accommodate other uses of the range resource. The local economy and social well-being are used to justify this massive increase in livestock development and the national and regional public interests are supplanted. The Preferred Alternative proposes 107 miles of new pipeline, with all the accompanying disruptive activities, building one reservoir, one well, water storage tanks and 98 miles of fencing. Alternative D has a far more reasonable expansion proposal of building 41 miles of new pipeline and 75 miles of fencing. Throughout the documents grazing was found to be responsible for degradation of native forage, extensive damage to riparian habitat and headwaters, and severe degradation to numerous cultural sites. Reduction of livestock competition would improve all wildlife habitats. The documents state that range improvements would be based upon trend information but also state that not enough trend plots and the subsequent information from them are available to determine trends and thus make decisions for livestock use. The massive grazing increases then must be based on something other than reliable trend information and thus the recommendation is not supportable or acceptable. Finally, the DRMP guidelines state that range improvements must be selected with "...The highest priority for implementation generally will be assigned to those improvements for which the total anticipated benefits exceed costs." The final RMP/EIS should address this standard and recommend grazing increases accordingly by providing substantive data to support the recommendation.

The DEIS refers to sustaining "existing" and "reasonable" wildlife populations. The "viable" standard is a significant departure from traditional goals and represents a potential dramatic reduction in populations of numerous species. Establishing a standard of "reasonable" populations is far too ambivalent to agree to. Certainly public scrutiny of the parameter of a "reasonable" standard is mandated by both NEPA and FLPMA. We oppose changing the standard from "viable" population targets to either "existing" or "reasonable". The DRMP clearly states BLM will maintain or enhance existing or potential populations while the DEIS states habitat will be sustained for "viable" wildlife populations. The Endangered Species Act requires protection and enhancement of habitat for listed or candidate species. Variance from this standard is frequent throughout the DEIS and conflicts with the language of the DRMP. The final documents must be in concert on this issue.

Timber harvesting of the Douglas fir on Bennett Mountain would not serve the public interest. No supporting documentation of the public profit such a sale and cut would realize is available. While there is a glut of timber and the timber market is falling, this asset should be retained. The timber provides crucial wildlife habitat, scenic values, opportunities for desert forest recreation & important soil stabilization. Under the preferred alternative 1,143 acres would be timbered and cause "...major long-term erosion from timber harvesting activities ... caused by road construction." Under Alternative D the major resources would be retained while recreational wood-cutting for home heating would be allowed.

If Alternative C was selected and implemented in the final plan, lands transferred out of federal ownership and put into irrigated agriculture would cost the non-irrigating public a staggering \$24.2 million annually. The preferred alternative flies in the face of the BLM's own rationale for selection of a Preferred Alternative which specifically states that "New public investments in these lands will generally be kept to a minimum." The DRMP guidelines also state that lands identified for transfer "must show a high likelihood that the lands can be farmed at a profit over a long term." The profit here is small in comparison to the costs and would be realized by only a few local individuals whereas the public loss for electric company ratepayers is huge as are losses in income and employment nationally. The BLM states that lands identified as valuable for wildlife should be classified "unsuitable" for transfer. The Jarbidge resource area includes a portion of the Snake River Birds of Prey Area, the densest population of nesting raptors in North America, and "Conversion of their forage habitat to monotypic stand of crested wheatgrass or irrigated agriculture reduces available prey and results in reduced productivity or territorial abandonment." A full 24% of the habitat would be eliminated by the land transfers proposed in Alternative C. Native wildlife would be lost within an 8 mile radius of the Snake River. Existing mule deer and antelope habitat would be lost and most important of all, 3,128 acres of long-billed curlew, a sensitive species, habitat would also be lost. This would result in a reduction in population of 20 - 25 pairs. This agriculture development is not needed and it would also result in the decline of sturgeon populations, Bliss Rapid snail and Snake River Physa Snail. A further degradation of environmental values would result when increased pollutants, pesticides and fertilizers associated with crop production, are injected into air and water. These lands, if transferred, would cost the public additional monies to correct the pollution problems. Further costs would be associated with massive soil erosion. "...soil erosion which occurs on public lands as a result of excess irrigation flows from private agricultural lands will be treated as a trespass in order to stop the erosion and to rehabilitate the damage to public lands." Farming is the greatest source of accelerated erosion in the area estimated to be at least 10 times higher than rangeland erosion. The transfer of 38,585 acres of land included in the Preferred Alternative is a bad business decision on behalf of the general public. It clearly exploits the public's interests by allowing degradation of the assets and creating massive financial burdens. This aspect alone should disqualify the Preferred Alternative, but there's more evidence that will show its lack of prudence.

As mentioned earlier, grazing on public lands with government subsidy continues to be an accepted part of our culture and that is evidenced by the public's willingness to allow grazing even in our wilderness areas. Alternative D, which is encompassed in our alternative proposal, would make an additional 10,399 AUMs available in the long term. Alternative C would increase livestock use by 6% initially, and by 66% in 20 years. Livestock would be allocated 99%

ORV recreation would not be significantly effected by wilderness designation as proposed in our alternative. Where it would be prohibited, it would "benefit non game, upland game and big game habitat." Over 1.2 million acres would remain open for ORV recreation. There is however a special problem with indiscriminate off-road vehicular use by ranchers. This situation is especially degrading to the natural environment during the spring season and should be curtailed.

The greatest number of elk and deer use Bennett Mountain in the winter. This area, MUA 2, is in extremely poor condition because of grazing and should be protected for wildlife habitat. An administrative management category is not sufficient to guarantee this crucial area is maintained. We support re-establishment of an elk herd on lands adjoining the Humbolt and Elko National Forests, and the subsequent protection of their habitat.

We believe the public would be best served if 340,000 acres of this resource area were protected by wilderness designation. The resources there can be utilized by multiple factions of the greater community while retaining the majority of assets for long-term public good.

Thank you for this opportunity to comment.

Sincerely,

Jane Leeson
Jane Leeson, Administrative
Assistant
Northern Rockies Region

Note: All quotations and numerical references were taken from the Jarbidge DRMP/DEIS.

South 709 Ray
Spokane, Wa. 99202
January 2, 1984

Mr. Joe Zimmer, Manager
Boise District, ELM
3948 Development Avenue
Boise, Idaho 83705

Subject: the Jarbridge EIS

Dear Sir:

In the following letter, I am offering my concerns and opinions on the Bruneau - Jarbridge (RHP/EIS).

As noted on pg. 4-69 Jarbridge EIS, plateau lands adjacent to the Canyon rims, if protected from cattle grazing, would benefit wildlife species such as Bighorn, Mule Deer, Elk, and Longhorn. Plateau protection would also give increased isolation to cliff nesting raptors such as Prairie Falcons, Peregrine Falcons, and Golden Eagles.

The EIS also stated that the vegetation in the steeper more inaccessible areas of the canyon was in good condition while the plateau vegetation was in fair to poor condition. This indicates to me that plateau areas adjoining the canyons should receive some wilderness protection from grazing. I am also concerned over the increased future use of ORV's in the area affecting soil erosion, wildlife disturbance, and vandalism to archeological sites.

I feel that wilderness status for the canyons and adjoining plateaus is necessary for those terrestrial mammals such as Bighorn, Bobcat, and Cougar, that are intolerant to the increased land usage by man.

Concerning riparian vegetation, I am concerned over the problems created by cattle grazing. This usage by cattle often destroys wildlife cover, forage, and contributes to bank erosion. This protection for riparian habitat is crucial for animal species such as otter, beaver, muskrat, and mink, and extremely important for the larger mammals such as deer, cougar, bobcat, and bighorn sheep. The importance of this type of habitat to shorebirds, amphibian and reptilian species should also be addressed.

Letter to Boise District, ELM

- 2 -

In conclusion, I am recommending the following:

1. Wilderness status for 340,000 acres, as proposed by the Committee for Idaho's High Desert.
2. Wild and scenic river classification for the Bruneau-Jarbridge, and protection for the East Fork of the Jarbridge.
3. Importance of establishing minimum flow standards for the benefit of fish, bird and mammal species, and boating recreation needs.
4. Opposition to the sale of public land, when such land provides jobs for public employees, habitat for varied wildlife species, and opportunities for public recreation.

Sincerely,

James E. McFarling

pc
vh



HAROLD C. MILES-CHAIRMAN-ENERGY & NATURAL RESOURCES COMMITTEE

IDAHO CONSUMER AFFAIRS, INC.

AFFILIATE OF CONSUMER FEDERATION OF AMERICA

116 Fifteenth Avenue South, Nampa, Idaho 83651
TELEPHONE 208/466-4152

January 3, 1985

Mr. Martin Zimmer, District Manager
Mr. Gary Carson, Jarbridge Area Manager
Boise District Office, ELM
3948 Development Avenue
Boise, Idaho 83705

Gentlemen:

Idaho Consumer Affairs, Inc. (ICA) submits the following comments on the Jarbridge Resource Management Plan and its Environmental Impact Statement Draft in addition to the ones submitted to you at the Boise Public Library hearing held on November 28, 1984, which were dated November 26, 1984. At this point we respectfully request both sets of these written comments be included in the permanent record of this hearing.

1. As we previously stated, in the main, we support Alternate D. However, we feel the 2,100 AUM's allocated to Wild Horse grazing is far, far too much, especially since your plan does not include substantial wildlife habitat restoration. Wild Horses compete with other wildlife for forage and water, besides they trample, overgraze and restrict native plant growth. Therefore, we request the AUM allocation annually be no more than 600 AUM's.

2. We are unalterably opposed to inclusion of any of the public lands covered by this EIS/Management Plan for additional agricultural development within the next twenty years. We call your attention again to the fact 936,000 acres were withdrawn from agricultural production in 1984 due to the various Federal Farm Programs. In addition, with all the media attention focusing on the fact that farmers in 1984 are worse off than any time since the "Depression Days" of the 1930's as well as the Federal Farm subsidy program in 1984 almost equalled the value of the agricultural commodities themselves, common sense dictates that additional pressure caused by ELM's allowing more Federal land to be put into cultivation and crop production makes absolutely no economic sense for the U.S. populace as a whole. In this connection ELM is requested to investigate the number of farm bankruptcies occurring in Idaho within the last few years and investigate the possibilities of additional ones occurring in 1985 and ensuing years. It is our understanding that some of these bankruptcies and farm land foreclosure sales were on holdings of well over 1000 acres each. Existing farmers do not need any pressure caused by additional commodity production from additional farm land acreage increases from ELM lands upon the already depressed farm prices. Agriculture in Idaho and elsewhere should survive on increased farm efficiencies and increased farm commodity prices, not Federal Farm subsidies.

3. In our written testimony of October 26, 1984, we inclosed a letter from
We Care About You
ICA Comments (1)

the U.S. Geological Survey's Idaho office stating that the average minimum flow at the Murphy gaging station over the period from 1961-83 was 6940 cfs. However, on December 12, 1984, the USGS wrote us to correct this figure (copy of letter inclosed) which is 6,065 cfs at Murphy for the period 1961-83. Also, we supplied you a copy of the November 9, 1984 letter from the Oregon Water Resources Department which identified 1009.4 CFS withdrawals from the Snake River between the confluence of the Owyhee River and Brownlee Reservoir which are of a consumptive use nature. In addition, we are submitting a copy of the December 17, 1984 letter from the Idaho Department of Water Resources identifying withdrawals of a consumptive use nature of 1297.44 CFS from Swan Falls Dam to Brownlee Reservoir, which is on the Idaho side of the Snake River. Consequently, it goes without saying that by reducing the minimum flows at Murphy to 3900 cfs, as the proposed agreement between the Idaho Power Co and the State of Idaho requires, subtracting 2307 CFS from this flow makes it virtually impossible to generate such electricity in a low water year by IPCO's Hells Canyon Project, considering it takes 33,000 CFS to operate the Brownlee generating station at full hydraulic capacity. As a result, IPCO (Idaho Power Co) will have to import a great amount of electricity during its summer peak periods to supply its customers with power for irrigation pumping, air conditioning and refrigeration.

As a matter of record, the farmers have maintained over the past number of years that electrical rates for pumping irrigation water makes it hard for them to make a profit on their farms. Hence, ELM's own analysis for its Alternative A through D shows that the total costs of electricity used either for pumping or down-stream irrigation will be considerable, which is one valid argument why ELM must not permit any more additional public lands in Idaho be put into additional agricultural crop production. Also, the stockmen need this additional land for winter grazing, not to mention the needs for this land for habitat, all seasons, by the upland game birds and other wildlife.

4. Concerning the need for wildlife habitat, we respectfully call ELM's attention to the fact that 1984 was a poor hunting year for upland game birds in Southern Idaho due to the severe winter of 1983-84, which we feel would not have been as severe if ELM had a better upland game bird and wildlife program. Hunting and fishing in Idaho is of as great economic benefit to this state from a cost to benefit ratio as is raising surplus farm crops costing the Federal Government and its taxpayers, us, billions of dollars in Federal farm subsidy programs. Consequently ELM must implement a program for this Jarbridge EIS/Management area which is more attuned with a Genuine Multiple Use program to include Fish & Wildlife habitat restoration and Wilderness Area designation and protection.

5. We support the Idaho Committee for the High Desert's Wilderness proposals, in the main, particularly their request that more bench land be included on each side of the various canyon rims, they have suggested, in order to better protect these Wilderness Canyon's ecosystems. Thus, we feel Wilderness designation is by far the best way to protect wildlife, especially endangered species, both plant and animal. Consequently, since Desert Wilderness possess a distinct beauty all its own, Idaho deserves more than 1/10 of 1% of its area designated as Wilderness in this Jarbridge EIS/Management Area and more than 18% of the roadless lands in these de facto wilderness study areas.

Respectfully submitted,

Harold C. Miles
Harold C. Miles-Chairman-Energy-Natural
Resource Committee-Idaho Consumer Affairs, Inc.

ICA Comments

(2)

Rt. 5, Box 309
Spokane, Wa. 99208
January 2, 1985

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Mr. Joe Zimmer, Manager

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p.2

Mr. Joe Zimmer, Manager
Boise District, BLM
1948 Development Avenue
Boise, Idaho 83705

SUBJECT: The Jarbidge EIS

Dear Sir:

I just finished reading the Draft Jarbidge Resource Management Plan and Environmental Impact Statement dated August 1984. I would like to offer the following comments and questions in regards to that document.

I am concerned about the possibility of a large amount of transfer of public land to private ownership for agricultural purposes as noted in Alternative B and C. No criterion were established under Alternatives A through C for identification of land for private transfer. Since massive land transfers will have ecological impacts, will there be a separate E.I.S.? How did you arrive at \$150 an acre as an average price of transfer (p4-5b)? How does one justify new agricultural land in an era of falling farm profits and surplus farm goods? An increasing number of economic studies question the expansion of new water projects in the arid west. Irrigated agriculture often is only economically feasible because the water is subsidized. Subsidized, uneconomic farming distorts agricultural markets and discourages water conservation resulting in water shortages. Some studies predict water shortages for southern Idaho. Water used for irrigation will not be available for hydroelectricity and could adversely affect fish and wildlife. The BLM should not be disposing of large amounts of public land without a Congressional mandate ordering such a sale. A separate EIS should be prepared before any large disposal of land is made.

Despite the fact that the preferred alternative proposes to dispose of 91,446 acres, Alternative C plans to more than double the number of AUM's. The "range improvement" projects that are proposed are, of course, schemes to put more cattle in public land. Since most cattle are raised on private land and the weak economic conditions prevailing in the beef industry, there appears no overwhelming reason to expand cattle production on public land. Herbicide spraying, chaining, possible exotic grass seedings are all best left to private enterprise on private land. Such "improvement" projects are potentially ecologically dangerous and destructive. You admit (p3-6) that resource information is lacking on most of the resource area yet you propose substantial single use expansion of cattle grazing. In Unit 2, Bennett Mountain, you admit that there are too many cattle allotments, but why wait for a management plan to reduce the number of allotments? If the BLM land was truly managed for a multiple use, then range deterioration should not have occurred in the first place.

Grazing damage to cultural and paleontologic resources indicates that the BLM has again subordinated other resources to grazing. However, the plans may be improved in this direction.

I did not find the MIG categories in Appendix A as noted on p 3-7.

Alternative D1 does not give numbers of wildlife AUM's that could reasonably be expected to exist in the absence of grazing. Only then can we see what the trade-offs have been made from cattle grazing.

A cost/benefit analysis for grazing is needed. Even if proposed grazing appears to be consistent with range conditions, the BLM should still demonstrate that the benefits are greater than the costs to the public. In view of the pitifully small amount charged for AUM's compared to private land charges, I would suspect that some units should not be grazed at all. Grazing permits are a privilege and not a right. The BLM is under no obligation to continue livestock numbers when grazing is uneconomic or conflicts with other values under all conditions.

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Mr. Joe Zimmer, Manager



SIERRA CLUB

107

Toiyabe Chapter - Nevada and Eastern California

January 4, 1985

Gary Carson, Manager
BLM/Jarbidge Resource Area
Boise District Office
1948 Development Ave.
Boise, ID 83705

Dear Manager Carson,

On behalf of the Public Lands Committee of the Toiyabe Chapter of the Sierra Club in Nevada and Eastern California, I would like to submit the following comments on the Jarbidge RMP/EIS.

Procedural comments.

1. MUAs. While dividing the Resource Area up into smaller areas with similar characteristics for analysis purposes appears to make good sense, detaching the EIS from the Plan is very confusing. I have not been able to determine the environmental impacts of the various alternatives in each of the MUAs. Table 2-25 is not adequate for this purpose. The Reader's Guide refers to various tables and appendices in Chapter 2 which give the management actions of each alternative plan by MUA, but there are no tables or appendices which give the environmental impacts of those management actions in each alternative. While I can understand that such analyses could create an even larger EIS and that such analyses are almost impossible because BLM's resource information is collected by allotment, not by MUA, the resulting disparity between the RMP and the EIS makes review for the public an exhausting guessing game. Since BLM chose to use MUAs in the RMP, BLM should in the FEIS provide tables and appendices of environmental impacts per MUA of each alternative, to the best of its ability.

2. Range of alternatives and issues analyzed. While credit goes to the Boise District for including a non-grazing alternative, more work could have been put into its development. The overall range of alternatives was not good, as most alternative actions did not significantly differ from one to another. The selection of issues to be analyzed was good, as most EISs in Nevada have eliminated all multiple use issues except range, wilderness, land disposal, and rights-of-way from any significant analysis.

3. Economic analysis. The economic analysis was quite inadequate. Revenues from recreational activities were omitted, even though one could expect that recreational income could far exceed ranching income, especially over time, in the RA. Also, there were no estimates of costs of implementing other than the livestock management program. Does BLM have the funds to administer the flock of proposed ACECs/SRMAs, etc.? What about...

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The rivers comprise one of the most outstanding regions in the U.S. under BLM jurisdiction. The reason given for non-wilderness (p5-16) is that the costs do not warrant exclusion. What wilderness exists? No cost/benefit data was presented. I suspect that the wilderness costs are substantially less than the costs of "improvements" for grazing.

In the Bruneau-Sheep Creek area (p12) your plan recommends no plateaus because of "conflicts with other resource uses", probably cattle and OWS's. Education signs and some enforcement will bring general compliance. If not, cancelling the allotment permits and arresting trespassers will bring compliance. It is ironic that the government agencies can find money for expensive pipelines and other water projects to benefit a few paying subsidized water and cattle allotments, but then whine that they can't find a few pitiful dollars to leave the land alone.

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You proposed little tablelands in the Owyhee Canyonlands and none in Jack's Creek area. Since the eastern plateau areas of the Jarbidge have low potential for cattle. Why not leave it as wilderness as it is part of the river ecological system in particular as far as wildlife are concerned. On page 43 you note the importance of the plateaus for mule deer, bighorn sheep, antelope, birds, etc. -- yet you leave much of it out.

In short, you make a poor case for leaving out the tablelands for wilderness protection. I have been into the Bruneau River country many times and it is spectacular. Although the proposed management plan corrects some of the past abuses from benign neglect, the wilderness proposed is mediocre in comparison as to what could be done for one of the most magnificent areas in the west.

Sincerely,

Pete Wyman

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costs of managing existing special management areas?

Substantive comments.

1. Livestock Grazing Management. The proposal for substantially increasing livestock grazing in a resource area of which 75% is in poor condition appears a gross dereliction of BLM's responsibility to manage the public lands for multiple use and sustained yield. Specific proposals for substantially improving poor condition rangelands must be made a part of this RMP. The BLM would get less flack from the public in its attempts to increase livestock forage if the Bureau was equally ambitious in repairing past damages to the public lands caused by livestock overgrazing and poor livestock management.

2. Wild Horse Management. The RMP is particularly deficient in management of this resource - 50 wild horses in over 2,000,000 acres?! If I understand the problem correctly, the current wild horse habitat is in an agricultural area and the small band is being harrassed. The proposed solution of decreasing the herd area by 20% is very poor. Why weren't other solutions analyzed - i.e., moving the bands to other areas without horse/human conflicts, etc.?

3. Wildlife Management. The RMP/EIS aptly but sadly illustrates the great loss of wildlife habitat and populations on our public lands due to past livestock overgrazing and mismanagement. The few proposals for protecting existing critical habitat and restoring or rehabilitating damaged habitat are grossly insufficient, as are the "reasonable numbers" that the poor condition range is able to support, but perhaps all that can be expected from a commodity-oriented national administration.

4. Riparian and Fisheries Management. My comments in #3 also apply to this important resource. Only Alternative D proposes any marginally significant improvement, but again, perhaps the proposed actions will at least prevent further deterioration. I would like to see proposals in the PRMP/EIS for more significant improvements in deteriorated riparian areas.

5. Minerals Management. The proposed minerals withdrawals do not appear to have any adverse impact on overall minerals activity.

6. Lands and Realty Transactions. It is not at all clear that the 60,000+ acres proposed for agricultural development are not automatic upon application (i.e., "before the actual transfer is completed"). Why such a large acreage is proposed for disposal before BLM has any definitive information on water availability, soil suitability, and economic feasibility is not explained, nor does it appear reasonable. Other criteria for selection of lands for disposal for agricultural purposes should be used, before such proposals are made in the land use plan.

7. Recreation Management. What are the statutory authorities for SRMAs, what regulations specify management requirements, and what

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are the economic implications of SRMAs (how much does management cost and where are the funds coming from)? Why aren't larger wildlife populations being planned for to meet increasing recreation needs, from hunting to observing, photography, birding, etc?

8. Wilderness Management.

King Hill - I concur with BLM's recommendations in the Preferred Alternative.

Bruneau/Sheep Creek - The BLM's rim-to-rim proposal is not adequate to protect the admittedly outstanding wilderness values nor the associated wildlife values, especially of big-horn sheep. The EIS did not identify any significant resource conflicts in the surrounding tablelands and the manageability problems appear grossly overestimated. The rationale for omission that the plateaus are in "poor" condition is inappropriate, as no law or regulation requires that wilderness areas be in excellent condition, and is particularly capricious as over 73% of the entire resource area is in "poor" condition anyway. I support the entire 100,000+ acres for wilderness designation.

Jarbridge River - I support the entire WSA as wilderness for the same reasons discussed above in Bruneau/Sheep Creek.

Special Designations - I also support special designations for all the non-designated wilderness areas.

I concur with BLM proposals for cultural resource management and paleontological management.

Although full of much information on the Jarbridge Resource Area, I found this EIS very difficult to review due to its poor organization and coordination of various elements. And my comments suffer from my inability to understand what the management problems are in the resource area, as well as what are the proposed solutions and their environmental impacts.

In any event, I am totally opposed to any increases in livestock grazing in MUAs # 3,4,5,7,6,8,9,14, all areas in which the total acreage is in poor condition, and to very limited increases in MUAs # 2,11,12,13, MUAs where the great majority of acreage is in poor condition, until objectives for significant range improvement are set and achieved as measured by monitoring over a five-year or longer period.

Thank you for considering my comments and for discussing the RMP/EIS over the phone with me today.

Sincerely,
Alan R. Ansell
Rose Strickland, Chair
Public Lands Committee

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IDAHO POWER COMPANY

BOX 70 • BOISE, IDAHO 83707

January 4, 1985

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Although the document indicates that existing ROW locations and utility ROW routes identified in previous environmental impact statements will remain available for ROW development, the ROWs are not identified in the present report, nor are existing or future corridors designated.

The document is misleading in its statements pertaining to the percentages of lands which are included as utility avoidance areas. As presented, these lands have the appearance of being a relatively minor amount of the total. However, upon closer examination, the locations and nature of some of these lands would have substantial impacts on where utility corridors would be allowed. The long, linear nature of the Bruneau-Jarbridge Wild and Scenic River avoidance area, for example, precludes vast expanses of land which may otherwise be suitable for consideration for future transmission needs. Similarly, the Salmon Falls Creek SRMA does not make allowances for the existing transmission line or the potential of an additional facility at some future date.

It is the Company's opinion that the management plan and EIS is deficient in that it does not identify and designate existing and potential utility corridors as provided for by FLPMA. Additionally, in cases of linear avoidance areas of the nature discussed above, windows (areas through which utility corridors would be allowed) should be designated.

The Company is pleased to note that the management plan and EIS consider the present concerns over Snake River water rights. As you are aware, Idaho Power and the State of Idaho have signed an agreement which, if implemented, should resolve the conflicts raised by the water rights issue. However, this agreement must pass several legislative and regulatory hurdles before it is fully implemented. Therefore, it is premature for the Company to provide detailed comment on the specific effects additional agricultural land development allowable under the agreement may have on future electric rates and hydroelectric generation facilities. However, we would be most willing to provide additional information concerning the effects of the Swan Falls agreement as its implementation proceeds, and suggest that provisions be made in the management plan to make necessary adjustments as this information becomes available.

Idaho Power is firmly committed to the principles of sound management and multiple use of public lands. It also is committed legally and morally to provide reliable electrical service to the many residential, farm and industrial customers it serves in southern Idaho, eastern Oregon and northern Nevada. Because of these commitments, and because reliable electric service is essential for our area's future economic growth, we request that you carefully consider the above comments.

Sincerely,
Alan R. Ansell
Alan R. Ansell
Environmental Studies
Coordinator

ARA:1f

-2-

Mr. Gary Carson
Jarbridge Area Manager
Boise District Office
Bureau of Land Management
3948 Development Avenue
Boise, ID 83705

Dear Mr. Carson:

Idaho Power Company offers the following comments on the Draft Jarbridge Management Plan and Environmental Impact Statement, prepared by the Bureau of Land Management, and dated August, 1984.

As you have noted in the document, Idaho Power Company and the Western Utility Group (WUG) have identified the existing and future need for planned utility corridors that will meet future energy needs in Idaho and other Western states through the year 2020. We oppose the elimination of two of these corridors (east/west) as proposed by your management plan, and request that you include such corridors in your final plan to permit needed future electrical transmission facilities.

The company is greatly concerned with the stated policy of identifying "avoidance areas". Although this concept has considerable usefulness in corridor planning, it is misleading to construe acceptance of the concept by planners and utilities as a replacement for the designation of utility corridors in the land use planning process. We believe that corridor designation is an important and critical element of land use planning and is an important planning tool for both land managers and the utility industry. Use of avoidance areas in lieu of corridor designation is not consistent with Section 503 of the Federal Land Policy and Management Act of 1976 (FLPMA), which clearly intends that utility corridors be established in order to minimize adverse environmental impacts and the proliferation of separate rights-of-ways (ROW).

Several existing electrical and gas utility facilities are presently located within the Jarbridge Resource Area, as well as several proposed corridors. Many of these are in direct conflict with the so called avoidance areas.

Segments of the Oregon Trail conflict with at least ten existing facilities, the Hagerman Fossil Beds with two existing facilities, and the Salmon Falls Creek SRMA with one existing facility. Several avoidance areas conflict with previously identified proposed corridors.

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3343 N. Maple Circle
 Boise, ID 83714
 January 1, 1985

Gary Carson
 Boise District BLM
 3948 Development Ave.
 Boise, ID 83745

Dear Sir,

I am writing to comment on the Jarvis RMP/EIS. Of those 91 points mentioned in the document, I would like to voice my support of Alternative D, but outside of these alternatives would like to support the Committee for Idaho's High Desert 340,000 acre conservationist wilderness proposal.

I am also very much for Wild & Scenic River status for the Jarvis, Sheep Creek, & Brunson Rivers. I have had the opportunity to hike at various places along the East Fork of the Jarvis River - down stream, all the way from the headwaters area in the Jarvis Wilderness in Nevada, to the abandoned gauging station in the main Brunson canyon. I had the opportunity here to place this entire river in the wilderness inventory would be an excellent addition (I am about the only complete river

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Small handwritten notes at top left of page 109.

system existed in this basin to my knowledge). With its wildlife, recreational scientific, scenic values, among others, this has many more values suitable for wilderness designation than things such as winter activities already take of major significance.

I also feel that wilderness designation ^(the way the plan is written) is a step in the right direction for recovery of things such as wild sheep & antelope ranges, also other for other higher habitat since they will tend to use plateau areas as well for grazing. I don't feel that resources are available there. Having heard some of these areas as mentioned before, I am extremely worried about the conditions of these plateaus, especially along their on the outer edges of the Brunson/Jarvis River canyon system. It does not take too long time watching one of these rivers rapidly turning them on such manner after a small spring or summer storm to realize that if severe erosion is a serious byproduct of this range condition as well as wilderness designation for plateau areas as well as the canyons will give at least one buffer area to mitigate impact, rather than allowing this rapid right to the canyon in itself. Things such as 40% designations are certainly better than no protection at all, but wilderness designation for these plateau canyon areas would give the best

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Small handwritten notes at top left of page 109.

the death needed to manage these rivers for wildlife & other public benefits by helping to reduce impact on an important wildlife range at a time when habitat destruction for these animals is probably one of, if not the biggest, ongoing (but also very quiet) threat.

It is worth the minimal economic advantages of having a simple grazing improvements when all costs including government expenditures are included, in an area such as this with so many other values, even with the cost of wilderness management figured in. I feel these areas would make a valuable addition to the nation's wilderness inventory.

Thanks very much for your time.

Sincerely,
 Brian Schoeff
 Brian Schoeff

12/26/84

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Mr. Joe Zimmer
 Manager, Boise District
 BLM
 3948 Development Avenue
 Boise, Idaho 83705

Re: Comments on Jarvis RMP/EIS

Dear Mr. Zimmer,

Thank you for sending the Jarvis Resource Management Plan and Environmental Impact Statement. I have reviewed both documents and, by means of this letter, now submit my comments.

Having grown up in Boise, & am familiar with most of the southwest Idaho region that would be affected by the Plan, & have fished, hunted and backpacked in the canyon and range country discussed in the plan. In my view, the Jarvis - Brunson region provides the people of Southern Idaho with some of the greatest opportunities for dispersed recreation that they have available to them. In light of the public values the area contains, the Plan's prescriptions for management -- and particularly its position on wilderness designation -- are inadequate.

First, the assumptions pertaining to economic benefits and impacts are designed in a manner that will assure a result biased in favor of agriculture in the region and against other income producing activities, such as recreation and tourism. Appendix A contains tables that demonstrate that BLM has made no attempt to analyze the recreation-based economy except to the extent that summary figures concerning "services" and "retail trade" might incidentally reflect that element. Moreover, Appendix A

shows that the BLM has failed to evaluate economic impacts the Plan might have on Ada, Canyon or Twin Falls Counties. Citizens in these and other nearby counties -- all of which have far greater populations than Lungee or Elmore -- will use the Brunson-Jarbridge area for recreational pursuits in increasing numbers in the future. Indeed, at page 4-18 of the EIS you acknowledge that recreation opportunities in the Jarbridge resource area are expected to increase by 67-77% by 2000. By failing to evaluate the economic value of hunting and fishing, river running, pack-trailing, or other recreational activities the EIS is inadequate. Indeed, the EIS appears designed to favor one segment of the economy -- that involving a local commodity development -- over other users of the public land. The EIS should be re-drafted to correct this error.

Second, the EIS does not support the BLM's minimal wilderness recommendation. The data developed in the EIS and the Plan supports larger acreage in wilderness status than the best preferred alternative. Alternative C should be amended to expand the wilderness proposed for the Brunson/ Sheep Creek area and for the Jarbridge River. These areas contain high quality wilderness that is unique in the West. There are not have other potential wilderness consisting of desert plateau and basalt canyon land forms -- nor are there comparable desert bighorn habitats or the state contained in these unique areas. Moreover, there are no significant conflicts in these areas between wilderness and other users. The BLM should expand the boundaries of its wilderness proposal so as to include significant plateau areas on Brunson/ Sheep Creek. The

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preferred alternative, which proposes only a 'trim to trim' wilderness, is not acceptable. Similarly, the BLM has made virtually no attempt to explain or justify its failure to propose including any plateau areas on the east side of the Jarbridge River. The Jarbridge River and the wild life it supports require, at a minimum, buffer zones on both plateau areas. Furthermore, the plateau areas are necessary to provide the canyon wilderness with the solitude such areas require. Obviously, activities on the plateau in the vicinity of the river would be visible, and likely audible as well, from the benches and open slopes inside the canyon. The plan and EIS should be re-drafted to propose at least two miles of plateau as wilderness on the east side of the Jarbridge.

Third, the BLM's wilderness proposal is not supported by a sufficient Environmental Impact Statement. The only discussion of wilderness in the draft EIS or in the management plan is contained in an appendix of some twenty pages. Nearly half of those pages are devoted to basic descriptions of the wilderness study areas or to describing the BLM planning process. The information in appendix J does not constitute the kind of detailed, inter-disciplinary analysis of wilderness that is contemplated by the National Environmental Policy Act. The "draft EIS" at least as to wilderness, should be revised. By attempting to use appendix J as a draft EIS, and then produce a final EIS and final wilderness study report based upon it, the BLM is attempting to circumvent NEPA.

Thank you for this opportunity to comment.

Sincerely,
Jeffrey C. Forrester

305 Noble Dr.
Boise, ID 83702

JANUARY 2, 1985

BUREAU OF LAND MANAGEMENT
BOISE DISTRICT OFFICE
3948 DEVELOPMENT AVENUE
BOISE, IDAHO 83705

REGARDING: WRITTEN TESTIMONY - DRAFT JARBRIDGE RESOURCE MANAGEMENT PLAN AND ENVIRONMENTAL IMPACT STATEMENT

ATTENTION: GARY CARSON, AREA MANAGER

DEAR GARY:

The format of our written comments on the Draft Jarbridge Resource Management Plan and Environmental Impact Statement will be as follows: First, this cover letter expanding on our concerns over some of the more important areas contained in the draft, followed by a schedule of our grazing preference and five year annual use, depicting the problems we have found in correlating this information with appendix Table F-4, and a detailed listing of proposed range improvements and vegetative manipulation to be included in the Multiple Use Areas in the Resource Management Plan under the letter H. Then finally, a detailed, paragraph by paragraph, analysis of the draft itself to be delivered to your office by Tom Blessinger, under the heading of The Official Comments By The "71" Livestock Association Regarding the Draft Jarbridge Resource Management Plan and Environmental Impact Statement.

To begin with we would like to note that some of the items to follow have already been discussed with you and your staff, along with possible solutions to these problems. However, we feel that it is still important to have these items on record along with the other concerns to be discussed.

The following are the items that we feel are of particular concern in this Draft:

1) Multiple Use - Included in the Summary of the Resource Management Plan on page iii is the following statement, "This Resource Management Plan is developed to guide the management of the public land resources in the Jarbridge Resource Area and to ensure that the public lands and resources are managed in accordance with the principles of multiple use and sustained yield."

In continuing through the draft the following statement is contained on page I of the Introduction to the Resource Management Plan. "The basic purpose of this plan is to ensure that public lands will be managed in accordance with the Federal Land Policy and Management Act of 1976 (FLPMA), under the principles of multiple use and sustained yield."

Both Multiple Use Plans and the FLPMA of 1976, recognize livestock grazing as an important factor in overall multiple use. However, it is difficult to determine from this draft that livestock grazing, one of the most important economic factors in this area, is of anything more than minimal importance on the public range. It has been told, to us, by you and your staff, that time and financial constraints were the main reason this occurred. However, the

most disconcerting thing about this situation is that other non-paying interests, such as people with wildlife and environmental concerns, do not appear to have run up against these same constraints. Had we as livestock permittees known that this Draft would come out in this format we can assure you we would have provided a substantial amount more of input prior to its release. This not having occurred, we feel it to be extremely important, as we have discussed with you, that livestock grazing be given more emphasis prior to the release of the final document, along with allowing substantial user input in the final proceedings.

II) Range Inventory - It has come to our attention through review of the Draft and discussions with you and your staff that there are a large amount of errors in the physical range inventory itself along with the schedules. These problems and possible solutions have already been discussed with you, and thus we will be just reiterating the following:

- A) Drop the forage use levels in the Multiple Use Areas under the letter A, due to the fact that the inventory data is not complete enough to back up these figures, and
- B) Completely redo Appendix Table F-4, breaking out those allotments under management systems, into another table, and using only the Grazing Preference, and Five-Year Average Use columns, due to the fact that the rest of the table is incorrect, brought on by the incomplete inventory data, and not addressing seasons of use. Thus, the only cognizant thing to do is to start with current use and then monitor any changes.
- C) Review the accuracy of the Grazing Preferences and Five-Year Average Use columns, as we have located several errors in this area. A statement depicting the errors we have found is attached.

III) Range Improvements and Vegetative manipulation. It is our opinion that specific amounts of range improvements and vegetative manipulation should be dropped from the draft, and proposed projects be addressed through the proper consultation under the Environmental Analysis process, due to the fact that, it is virtually impossible to determine what projects will be required over the next twenty years, and which projects will be feasible, due to time and financial constraints. However, it is possible that we could support attempting to identify specific projects that would be required in the near term, and in addition, inserting a clause allowing range improvements and vegetative manipulation on an additional 2% of the acreage involved per year. It is with this thought in mind, that you will find a schedule of proposed, near term range improvements and vegetative manipulation attached to this document for Guerny, Inc.

IV) Animal Damage Control Program. Due to the economic losses suffered by range sheep operations throughout the year and cattle operations at calving time, and to losses of wildlife throughout the year from depredation by coyotes and other predatory animals, it is impossible for us to support this Draft in any form, without its coming out in support of the Animal Damage Control Program through specific statements that efforts will be made to provide funding for said programs, and that continued operations of such programs will

be allowed on Public Domain without any further constraints.

V) Wildlife - The sections in this Draft covering proposed wildlife populations are extremely confusing at best, leaving much of the information to be determined through the use of the reader's imagination. It is with this thought in mind, that we feel the following would be a better method of handling wildlife populations in the area:

Wildlife in the area will be managed at current levels and monitored prior to any increases or decreases being proposed. Then, if an increase or decrease is proposed, it will be implemented, only after the proper consultation and co-ordination with the affected parties has taken place, and any problems have been mitigated.

Also, Table 2, on page 82 and 83 of the Resource Management Plan will have to be relocated and footnoted so that it is more determinable that it applies only to Oil and Gas activities and major construction, and is not meant to impede range improvement maintenance or construction.

VI) Wilderness and Wild and Scenic Rivers Designations - We are in total opposition to the proposed wilderness Areas and Wild and Scenic Rivers for the following reasons:

- A) It is our opinion that Idaho already has enough land locked up under these designations, taking it out of the availability for further development and eliminating the possibility of its providing any economic benefits, and
- B) Due to the location of and terrain of these proposed areas, they are in fact defacto Wilderness Areas and Wild and Scenic Rivers and will remain so into the future. Thus, not requiring the actual designations, which in essence only serve to withhold surrounding areas from further development, and
- C) By designating these areas as Wilderness Areas and Wild and Scenic Rivers you limit the number and type of people that can take part in these areas. Elderly and handicapped people aren't able to access the areas and working people don't have the time it requires to enter the areas.

Thus, we feel that these concerns must be given consideration in making your decision on Wilderness Areas and Wild and Scenic Rivers, as these are concerns and people that you are required to take into consideration under the policies of Multiple Use.

VII) Proposed Introduction of Elk - We are opposed to the proposed introduction of Elk for several reasons some of those being the following:

- A) That the proposed elk herd, will be a Nevada herd if introduced and thus provisions for the elk should be made on the Nevada side of the border, and
- B) Should the elk enter the Idaho side, which they would most certainly do due to its ease of access. They would cause considerable private property damage to haystacks, fences and pastures, without, at least at this point, the Nevada Department of Wildlife's being responsible

to pay for damages, and

C) The fact that under the Idaho Fish and Game Five Year Plan for Mule Deer, 1981 Thru 1985, they state that on the island, an area within the Jarbridge Resource area, under the Diamond A Multiple Use Area, and an area that has a large possibility of winter use by the Elk, over-grazing of forage and shrubs used by deer, already exists, due to the large population of deer in that area. Therefore, we don't believe that the problem should be compounded by the introduction of an elk herd.

VIII) Bighorn Sheep Habitat - We are not in opposition to the attempts to maintain the Big Horn Sheep in the Bruneau / Jarbridge River area. The thing that we can not condone, however, is the buffer zone of one and one-half miles on either side of the area. This type of planning in essence creates a conflict before one even exists, when there are no conclusive studies that show that Bighorn Sheep and domestic livestock can not co-exist in the same area, or the contrary most studies are beginning to show that they probably can co-exist in the same area quite well. Thus, we feel that the proper approach to handling this situation would be to maintain a rim to rim Bighorn Sheep Habitat, and then if a conflict did occur, handle it on a site specific basis with the proper consultation and co-ordination of the affected parties.

IX) ACECs or Cultural Sites - On the subject of ACECs or Cultural Sites we are not in disagreement that there are several Cultural sites in this area that warrant preserving. However, we do feel that an attempt to preserve each and every site, that possibly, in the remotest sense of the word could be considered a cultural site, is taking the issue to too much of an extreme, such as in the instance of the Devil Creek Canyon Complex. We feel that a more realistic approach would be to develop a method of prioritizing the sites, so that the more important sites could be saved, and that at this point the more important sites could be managed with the care that they should be, a situation which would not be feasible for you agency if all the sites listed in the draft were maintained. This also could be done on a site specific basis after the proper consultation and co-ordination.

As to choosing a preferred alternative we would like to make our choice within the following contexts: If the proper changes are made to incorporate the majority of ideas contained in this letter, and the detailed paragraph by paragraph analysis of the Draft contained under the heading of The Official Comments by the "71" Livestock Association Regarding the Draft - Jarbridge Resource Management Plan and Environmental Impact Statement, and the proper amount of user input is allowed in the final stages of the Plan, then we do believe that Alternative C can be made to be the preferred alternative.

In closing, we would like to thank you and your staff for the opportunity to comment on this Plan and note that we look forward to working with you in the final stages of the development of the final plan itself.

Sincerely,
Guerny, Inc.
Guerny, Inc.
Guerny, Inc.

bureau of Land Management
 Boise District Office
 3700 Development Avenue
 Boise, Idaho 83705

December 31, 1984

DRAFT:
Jarbridge Resource Management Plan
and
Environmental Impact Statement

the BLM is to be admonished for failing to adequately notify the public that this was also a DMS for proposed wilderness designation of three MSAs. Heinous action such as this further widens the credibility gap between the federal government and the public sector citizens.

The management prescription for terrestrial wildlife within the 17 MSAs are incomplete and misleading. MUA-1 is the only unit that mentions winter habitat and it does not discuss habitat for other seasons of the year. How many wildlife animals will use each MUA year long? How many in the winter? How can you allot forage without knowing these figures?

For allotment figures for wildlife in this RTP-DMS it appears that the DMS may be those terrestrial wildlife worse enemy. The preferred alternative in Table 2-5 allots 3,877 AMUs (20 yrs) to wildlife; however if one uses the correct totals from Table B-4 (not C) the allotment would be 3,700 AMUs. Also in Table B-4 (not C) the 20 year total for livestock should be 270,125 AMUs not 271,425; the total for bighorn sheep should be 478 AMUs not 528; and the total for elk should be 610 AMUs, not 566. These errors in addition have been carried to or from other tables which have a tendency to make all tables suspect.

In the preferred alternative, Table 2-5, 3,877 AMUs were allotted to wildlife (yr.20). This is less than 10% of the required need. Table 2-5 shows mule deer year long 3,300, winter 11,110. These deer would need 14,774 AMUs, they were allotted 2,428 AMUs (Table B-4). Bighorn sheep 369 year long, need 976 AMUs, allotted 508 (B-4) which has a 100 AMU error in addition. Antelope 4,370 year long, 3,160 winter, need 2,702 AMUs, allotted 263 AMUs (B-4). Elk 220 year long and 300 winter, need 3,040 AMUs, allotted 566 (B-4) when Table B-4 has a total that cannot be verified. These terrestrial wildlife need 21,572 AMUs of forage while the BLM has only allotted them 3,877 (?) AMUs.

Under alternative C, using units shown in Tables B-4 and B-1, (year 20), the forage is over allotted in MSAs 1, 2, 4, 5, 8, 9, 13, and 14. MUA 12 is also over allotted. These nine areas have been over allotted by a total of 3,576 AMUs, could this be the reason some of the ranges are in such poor ecological condition?

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The situations need to be reevaluated and corrective action taken. Management practices in these areas appear to be lacking oversight and/or supervision.

"Fewer than 1,700 California bighorns exist in the United States." (p. 17). A Status Report on California's bighorn sheep on March 1975, in National Antelope Refuge, Oregon, 1975 by Ken West says, "estimates that close to 1,100 of these sheep are now present in Oregon. The 1,700 figure for the United States is based on a 1975 report, when Oregon only had 320 California bighorn. The U.S. total in 1975 is closer to 4,000."

"In the event Congress does not classify the areas wilderness, the area within Oregon sheep habitat would be managed as an AGCR and the remaining areas would be managed for primitive and semi-primitive, non-motorized values." (p. 17-18). The BLM is telling us that these areas will be managed as either wilderness or pseudowilderness areas, no matter what.

On page 7-20 under alternatives A, C and D it is stated, "The increase in additional closed areas comes from wilderness designation, wilderness and AGCR designations... wilderness and AGCR designation." Note that the statements are positive of wilderness designation. Has the BLM assured the authority to designate wilderness areas?

Alternatives considered but not developed (p. 7-22). Alternative B, belongs under this heading as the BLM knows that it is extremely unlikely that selection could be made due to adverse social and economic reasons and it is not consistent with existing laws and regulations.

Under recreation, items 3-16 and 3-17, the term "recreation opportunity spectrum (ROS) classes" is used. Were these six classes designed for this HW/AGCR only? They were not used in the Jvhee Canyonlands Wilderness DUIS or the Jacks Creek Wilderness DUIS, nor have definitions been given in this HW/AGCR. Why?

The visual resource classification map 3-C used in this DUIS is very inadequate. First, the map should have been at the same scale as Map 3-2. Second, the classifications should have been shown by bars, cross-hatching and shading. Third, on the larger scale map the MSA and WSA boundaries could and should have been shown.

I also challenge three of the VMA Class 1 areas, map 3-8. The area that is in T3 and Q3, H10L, this area is of rolling hills most of which is low sage in poor ecological conditions. Also about one-half of the burn in sections 7, 11, 13 and 14 H10, H10A is included in this Class 1 area. Outside of the Pine Hill and east fork King Hill creek canyons most of this area is probably VMA Class 3.

112.1

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112

the low narrow strip, shown as VMA Class 1, that lies in 1675, 16147, about one third of this area is in section, one third in 1675. The area in poor ecological and the other one third was not inventoried for vegetation or ecological classification, yet the BLM sees this area as VMA Class 1 land. Why?

112.1

Also, the area shown as VMA Class 1 in the southwest quadrant of map 3-8, this area not only takes in the canyons of Brunson and Jarbridge rivers but also the tablelands and plateaus. These tablelands and plateaus are sparsely covered with low-growing scrubbrush in poor ecological condition, which would place them in VMA Class 11L. Also included in this so-called VMA Class 1 area, by the way, is a burn of approximately 3,000 acres in T13S, R7E, this should be VMA Class IV. The seedling on and around Poison Butte, of about 2,500 acres is also shown as a VMA Class 1 visual resource. Why? The gross misclassification of these areas shows a lack of professionalism on the part of the BLM staff, as well as an attempt by the BLM to prejudice two of the areas in favor of wilderness designation.

Of multiple resource benefits: "The benefits to other multiple resource values are those which only wilderness designation of the area could ensure." (p. J-2). "Wilderness designation of the area is not necessary to secure long-term multiple resource benefits to other resource values." (p. J-13). It appears that the BLM is unsure of its stand on multiple resources other than wilderness. The statement on page J-13 is the most plausible as it is next to impossible to manage other resources under wilderness designation.

112.2

"The area must be capable of being 'effectively managed' to preserve its wilderness character..." (p. J-3). The term 'effectively managed' is not to be found in the Wildlands Act, 70 60-577, the Federal Land Policy and Management Act, 70 94-274, or in the Wilderness Management Policy Handbook, Section 603 of 70 94-274 states, "The Secretary shall continue to manage such lands according to his authority under this act and other applicable laws in a manner so as not to impair the suitability of such areas for preservation as wilderness." This law does not say "effectively managed", it is the "wonder" of the people thru Congress and in cooperation with the BLM, that the BLM manages all public lands for their intended use. To do otherwise is to DISOBEY those laws.

112.3

Along Pine Creek, WSA 17-2. Of the imprints of man identified on page J-5, no mention was made of at least five man made reservoirs as shown on Map 3-2. Why?

112.4

"There is no feature in this unit equivalent to the river canyons of the other units..." "...good to excellent topographic and vegetative screening in the unit ensure that the WSA as a whole has outstanding opportunities for solitude." (p. J-8). This area of low scrubbrush in poor ecological condition does not provide

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112

good much less excellent vegetative screening. "The degree of topographic and vegetative screening is greater in the north half of the unit." (p. J-8). Therefore the unit as a whole does not have excellent vegetative and topographic screening as claimed. The burn in the southern portion of this area also detracts from its wilderness quality. This area does not have good to excellent scenic quality as claimed on October of page 7-22. This WSA is not needed to provide diversity in the HW as nor would it be outstanding when compared to other units in or proposed for the HW/S.

112.4

Brunson River-Sheep Creek, WSA 11-17. "The length of the canyons, 7.5 plus miles of major canyons and 20 plus miles of tributary canyons, decrease the probability that visitors will feel confined or restricted by the canyons." (p. J-9). The BLM has no data to prove this statement. The lack of adequate ingress and egress routes for these 600 to 1,200 foot deep canyons intensifies the confined and restricted feelings for canyon visitors. "The wandering canyons are typically narrow, deep, and sheer-walled." (p. J-6). Once a visitor penetrates the canyon, the fact that he has to go for miles to get out makes those narrow, deep, and sheer-walled canyons more confining.

112.5

"This WSA is 37 miles long and varies between 1/2 mile and 10 miles in width." The BLM is proposing a HW to HW wilderness area 37 miles long with an average width of four-tenths of a mile wide. This long extremely narrow unit would not make for a viable wilderness area.

"...the areas are generally self-protecting because of rugged topographic relief, rock soil conditions, and due to their isolation from major highways." (p. J-15). Since this area is long and narrow, and is self-protecting it would be better managed under multiple use other than wilderness.

112.6

Jarbridge River, WSA 17-11. Besides the two private inholdings, shown by bar graphs, on Map J-5, ownership symbols also indicate that the SW 1/4 of the SW 1/4 of section 33 T12S, R7E is also private.

112.7

only two stock reservoirs were indicated as being inside of this area, yet map symbols indicate at least five reservoirs. Near the SW corner sec. 26, T13S, R7E. In the SW sec. 27, T13S, R7E in the SW sec. 14, T13S, R7E in the SW sec. 11, T13S, R7E and in the SW sec. 24, T13S, R7E. The Poison Butte Storage Reservoir is also shown to be within the WSA.

112.8

"Visitors could be expected to congregate on the canyon rims because of spectacular vistas." ---"Visitors to this region would be well dispersed, both among the draws and along the canyon rims." Both of these statements are from the same paragraph on page J-6. Which of these statements would the BLM have us believe, that visitors will congregate or be dispersed along the canyon rims? Is the BLM using unqualified pseudo-specialist to draft their reports?

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as in WSA 11-17, the BLM would have us believe that visitors in the bottom of 1,200 foot deep narrow canyons, defined by both sheer-walled cliffs and steep talus slopes would feel less confined or restricted because that canyon is 1/2 plus miles long. Who are they trying to fool?

"Good access roads and the ease of mobility across the flat tablelands ensure that the area's experience of encountering the spectacular scenery of the canyons in a wilderness setting and with a sense of solitude is within the physical capabilities of nearly all Americans." (p. J-11). "Each alternative presented in this HW contains recommendations for prohibiting recreational use of existing roads." (p. J-17). Not only does the BLM plan to close roads to recreational visitors, which is contrary to public law 94-279, but they would have us believe that americans handicapped, elderly and non-athletic citizens will traverse with ease, the so-called flat tablelands between the west boundary of the Jarbridge River WSA and the Jarbridge River canyon which is a distance of from one to seven miles. This hike over and back is no easy task for most Americans.

112.9

"In addition to being a sensitive species, California bighorn sheep and bobcat are wildlands or wilderness dependent species because of their extreme intolerance to the presence of man." (p. J-12). The BLM has not defined in this HW/AGCR, what constitutes a wildland or how many of the 14, or more of the game animals or the 330 non-game wildlife exist in a non-wildlands or wilderness environment. Of the many locations where the 1,400 California bighorn sheep in Oregon are found, only those in the Strawberry Mountain Wilderness area, are not doing well. A quote from a 1973 Status Report by Ken Voret of the BLM, "In 1971, 21 sheep were released in the Strawberry Mountains, but this is one place where they don't appear to be doing well." Wilderness areas are not needed for the California bighorn sheep, bobcat, or any other wildlife to survive. Wildlife do need adequate habitat. How has the BLM identified what constitutes their so-called "extreme intolerance to the presence of man." Is this a scare tactic phrase?

112.9

"The Brunson and Jarbridge River canyons have been identified as potential habitat for the endangered bald eagle." (p. J-17). Identified by whom, man or the bald eagle? Since the bald eagle use the habitat of the Snake River along the eastern boundary of this resource area, why do they not use the "potential" habitat of the Brunson and Jarbridge rivers along the west and southeast corners of the same resource area? Is the BLM going to force the bald eagle to use this "potential habitat?" Under any given condition what is potential habitat?

112.10

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112.11

"Boundary adjustments have been made to eliminate major channel stem ponds." (p.3-17). -- "These ponds and all way, customarily used for water control, will be closed to recreational use." (p.3-19). Closing ponds and channel stem ponds are contrary to public law 96-77, and also violates a direct order of the BLM, the agency and non-agency.

112.12

"Without wilderness designation, 20,000 acres of riparian and portions of the channel/canals and all way, customarily used for water control, will be unprotected." (p.3-19). -- "If these 20,000 acres would be unprotected without wilderness designation, why is the BLM proposing only 20,100 acres for wilderness designation? Does the BLM not care that there will be 10,000 acres unprotected? Is the BLM trying to tell us that without wilderness designation they do not have enough laws, rules and regulations or expertise to protect our public lands?"

112.13

"Without wilderness designation, proposed utility corridors could be authorized at some future date." (p.3-19). -- "When is the BLM going to stop trying to mislead the public with this statement? Section 4 of the Wilderness Act, PL 96-77, states: 'No public lands shall be included in a national monument or preserve unless the Secretary of the Interior, after consultation with the appropriate Federal agency, is satisfied that such preservation is in the public interest, and in accordance with such requirements as he may deem appropriate, authorize proceeding for water resources, the development and maintenance of reservoirs, water conservation works, power projects, transmission lines and other facilities needed in the public interest, including road construction and maintenance essential to development, and use thereof.' Wilderness designation does not guarantee that the area is immune from construction projects, and this is a presidential decision not congress."

112.14

"Formium was discovered here in 1950. -- The material is sold worldwide with prices varying from \$1.00 to \$600.00/lb." (p.3-20). The statement concerning the price of this material is very misleading to the public, and is a clear attempt to sell the BLM as they have not explained the extreme high price of Formium. The price of top quality, near primum quality, Formium is in the \$10.00 to \$15.00/lb. range. I have been active in the rockhound hobby for over 25 years and it is most difficult for me to imagine any piece, in any piece in a finished state selling for \$600.00. The BLM has implied that this is the price of the material as it comes from the mine. I request that the BLM furnish the details of the \$600.00 sales.

- 1. It is impossible to enforce this draft bill/plan, when the bill 1. proposes closing or eliminating roads that will exclude the use of public lands by the handicapped, elderly, and non-athletic.
- 2. The over-allocated the forces in line of sixteen miles the areas at the expense of wildlife.
- 3. It proposes multiple agency designation for the same areas, which creates many other problems.
- 4. It has shown lack of professionalism in the handling of similar, BLM Resource Classifications.
- 5. It has not provided information in the proper manner that this will address wilderness proposals.
- 6. It proposes and then looking in wilderness qualities for preservation in the wild and wilderness areas, that would best be managed under other multiple use management plans.

Line 201,
Frank Langley
 201 - 201
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 201 - 201

December 26, 1984

Mr. Gary Carson, Jarbridge Area Manager
 Boise District Office
 Bureau of Land Management
 3948 Development Avenue
 Boise, Idaho 83705

RE: Comment on the draft Resource Management Plan/Environmental Impact Statement for the Jarbridge Resource Area (Reference 1616.7 JRM#)

Dear Mr. Carson:

I greatly appreciate this opportunity for public comment on the draft Resource Management Plan/Environmental Impact Statement for the Jarbridge Resource Area. Your team has clearly invested a great deal of effort in developing this draft document and has done a good job in analyzing an extremely diverse topography and resource base. There are a number of general and specific comments I have which should contribute to the quality of the final document.

Snake River Aquatic Ecosystem
 The description of the aquatic habitat (3-16) is good, and it is gratifying to see accurate descriptions of the Bliss Rapids Snail and Snake River Physa Snail. It should be noted that both of these species are in Category I, indicating that sufficient biological information has been collected to warrant listing. The Bliss Rapids Snail is a monotypic species in an undescribed Hydrobiid genus and is a significant example of radiation among a fauna now largely extinct. Also present in this area of the Snake River is *Fontelicella idahoensis*, a species which has always been associated with the Snake River and whose former range in the Middle Snake River has now shrunk to the free-flowing reach between Bancroft Springs and C.J. Strike Reservoir. *Fontelicella idahoensis* is an endemic species which would be impacted by mainstream Snake River water projects were they to be constructed within its distribution. The status review for this species recommended listing the species as Endangered, although no action has been taken. Another sensitive invertebrate is the Utah Valvata Snail, *Valvata utahensis*. An isolated population of this species exists in the Thousand Springs area of the Snake River. The Giant Columbia River Limnet, *Fisherola nuttalli*, has been found in the Snake River in Idaho in only two areas, and represents a significant population isolated by hundreds of miles from other surviving populations in the Columbia River drainage. Characteristically it is found on boulders in rapids, often occurring with the Bliss Rapids Snail and Snake River Physa Snail (see Final E.I.S. for the A.J. Wiley Project, FERC Project No. 2845 and status reviews by Dr. D.H. Taylor). The invertebrate community in the Wiley Reach (from Lower Salmon Falls Dam to the Bliss Inroadment) is a remarkable surviving example of the natural community assemblage that was once characteristic of the upper Middle Snake River, and this unique remnant of fast-water riverine ecology should be recognized in the aquatic habitat segment of the final document.

National Natural Landmark Candidates within the Resource Area
 The final document should clearly discuss the A.J. Wiley Reach of the Snake River as a candidate National Natural Landmark. The eligibility study has received anonymous peer review, and the Natural Landmark Brief reads in part as follows:

Description
 "The A.J. Wiley Reach, a 12.9 km (8 mile) free-flowing segment of the Snake River between Lower Salmon Dam and the Bliss Dam impoundment, forms the boundary between Gooding (north bank) and Twin Falls (south bank) Counties near the town of Bliss in south-central Idaho. The Wiley Reach has been designated the sixth ranked site in Idaho under the U.S. Fish and Wildlife Service's 'Unique Wildlife Ecosystems Program,' and is described in the inventory of Important Fish and Wildlife Habitats in Idaho (U.S. Fish and Wildlife Service, 1980). This site is the best remaining of the Snake River Plain as a natural habitat in the interior extension of the Columbia River faunal area of influence in the Snake River system, as well as being the best example of the Snake River Plain anadromous (Thousand Springs) region. It has significant elements of rarity, endemism, and endangered situations, including plant, fish, and molluscan species. It contains the best fast-water habitats in the Snake River Plain with a remarkable invertebrate fauna, including a unique assemblage of molluscs. The molluscan fauna reflects the geologic history of the Snake River and southern Idaho, and includes relict species from Pliocene and Pleistocene lakes. "bin river" species restricted to the Snake River that entered the river system at different times, and widespread elements. There is an undescribed monotypic genus (Hydrobiidae) and another undescribed species (Physidae) restricted to fast-water habitats occurring as endemics at this site. Similarly, the other invertebrate fauna is accurately representative of the native Snake River ecology, and the length of the reach and diversity of habitats allow the native community interrelationships to persist. The aquatic ecosystem has national significance. The Wiley Reach also demonstrates the relationship between the Thousand Springs microhabitats and the Snake River."
 "In addition to the best remnant fast-water habitats in the Snake River Plain, the reach has outstanding groves of hackberry (*Celtis reticulata*) and other specialized riparian formations (such as water birch, *Betula occidentalis*, associations). The hackberry stands are composed of individuals larger than species descriptions predict and are probably the most extensive stands in the state. The deciduous riparian woodland formations, with several other riparian communities or zones, are significant at this site and are comprised principally of native species. Riparian woodland represents less than 0.1% of Idaho's habitats, and deciduous riparian woodland much less than that; none of this habitat type is protected in the state. Another specialized micro-habitat well displayed on the Wiley Reach are gravel terraces and alluvial detritus sites to which certain species are restricted. *Astragalus purshii* var. *ohionensis*, a species on a federal endangered "watch list", occurs at more than a dozen of these localities along the reach with well established populations. This species is otherwise known from less than two dozen localities, many of which are threatened...."

National Rivers Inventory
 The National Park Service included the A.J. Wiley Reach in the National Rivers Inventory, authorized by Section 5(d) of the Wild and Scenic Rivers Act. The site is described in that study as follows:
 "Outstandingly Remarkable Values: Recreation, Geologic, Wildlife, Historic, other Narrative Description of Values: Mid-section of a 1,000-mile river; highest volume in the northwest after Columbia River. Contains three USFWS candidate threatened and endangered aquatic species: Snake River Physa Snail, Bliss Rapids Snail, and Shoshone Sculpin. Critical habitat and type locality for both snails. Riparian zone contains several threatened plant species. Outstanding waterfowl habitat; identified in USFWS Unique Ecosystems Study. Regionally significant "big river" fishing and whitewater boating opportunities."
 I urge the BLM to request a Congressional study for Wild and Scenic River quali-

ification as a Scenic or Recreational River segment. The BLM should include the Wiley Reach in its Potential National Rivers discussion on page 90, and this reach should be "treated as though it were a component of the National Wild and Scenic River system" until Congress acts (analogous to the BLM's treatment of the Bruneau and Jarbridge Rivers). The discussions of recreation are inadequate in dealing with rafting or whitewater boating/inner tubing opportunities. The SCORP projections foresee great increases in need for such activities in the future as the population base grows, and this document should recognize the Wiley Reach as an excellent site for this activity (see the Wiley F.E.I.S.).

Areas of Critical Environmental Concern

The BLM is to be strongly commended for its proposed designation of the Hageman Paleontologic, the Sand Point Paleontologic, Geologic and Cultural, and the Bruneau/Jarbridge River (ACEC) for Bighorn Sheep Habitat and Cultural Resources Areas of Critical Environmental Concern. I urge the BLM to stand firm in its protection of the Hageman and to take whatever action is needed to curtail the irrigation induced problems that are currently degrading the site. This is one of the reference sites for interpreting Pliocene faunas and is of international importance. As you mention (p. 63), this site is a designated National Natural Landmark, and I urge the BLM to designate it as a Research Natural Area in addition to according ACEC management. I disagree with allowing any ORV use of the site because enforcement of the ORV use on non-designated trails is not going to happen, and this group has ample other areas of little or no significance in which to "recreate." This is a consumptive use which has no place near and is not compatible with stewarding an internationally significant resource. In the Final E.I.S., please include the complete citations of references listed in the two Paleontologic ACECs in your Literature Cited section. In your assignment of ACEC status to Bighorn Sheep habitat, I urge the inclusion of all currently used and potential bighorn sheep habitat. This would include Sheep Creek, the east fork of the Jarbridge River and suitable habitat in Salmon Falls Creek. The protection of Bighorn Sheep habitat in the east fork of the Jarbridge should be coordinated with the Nevada BLM and the Forest Service to make the protection cohesive and complete.

It is my understanding that there is a possibility of re-introducing elk into the Jarbridge Mountains, which could cause elk use of winter habitat in the RA. I wholeheartedly support this proposition, and commend the BLM on its willingness to allocate winter forage AUMs to elk if the planting is accomplished.

Economics

The draft document is deficient in not presenting an analysis of the economic value of hunting and non-consumptive outdoor recreation so that the reviewing public can compare this with the alleged economic benefits of livestock grazing. According to the data presented, grazing accrues only about 0.26% of the total personal income of the three county area in the RA. What would the value of hunting, outdoor tourism and other non-consumptive uses be at the maximum level the RA could sustain? To truly represent the public interest non-commodity production values and uses should be maximized.

Land Transfers

I am strongly opposed to the opening of 74,561 acres of public land in the RA to desert entry for irrigated agricultural development. This will only serve to exacerbate the plight of small farmers in southern Idaho, shift an enormous economic burden in electrical subsidy (\$24.2 million/year) to other electric. I also support the ACEC proposal for Salmon Falls Creek Canyon, which Alt. D would endorse.

the Snake River from Shoshone Falls to Hells Canyon. Alternative D should include a management plan or directive for whitewater boating use of the Wiley Reach (just as is done for the Jarbridge/Bruneau), and extending a SRMA for that purpose.

Grazing

Alternative D would decrease grazing by 26% initially, although additional AUMs would be allocated by the end of the twenty years. This is the only Alternative which even contemplates a parity of consideration among the multiple uses, although wildlife comes in at 3.35% of the allocated AUMs (the other 96% going to livestock). The economics of hunting, fishing, boating and so forth are not discussed, with only losses in agriculture being cited. Similarly, Alternative D - no grazing - does not evaluate jobs created or money generated by the community through non-consumptive uses over time as the ecosystem recovers and wildlife populations increase. What is not discussed in any of the Alternatives is the fact that even with the incredible federal subsidy or welfare that public grazing provides, grazing the public domain is becoming less and less competitive with non-subsidized farmers who produce 97% of the livestock in the United States. The whole premise of continuing to pump up a dying industry may well be unfounded, and yet another Alternative should be designed beginning with D and recouping AUMs if good economic benefit cannot be demonstrated, perhaps ending with D. It should be remembered that special interest livestock grazing is only one form of multiple use and that if the law is read closely there is little legal basis for the allocation of anything over 50% of the forage base to it. The BLM should read Coggins' analyses of true multiple use and sustained yield, which means perpetual, high level annual resource outputs of all renewable resources. One of the central goals of the FLMPA is to "meet present and future needs of the American people" through its management strategies. FLMPA does not refer to "such specific goals as supporting local economies, developing regional industries or commerce, producing energy, subsidizing the livestock industry, or providing facilities for nature lovers" (Coggins, Study IV, 1983, p. 51). The fact that the wildlife oriented Alternative allocates 96% of the resource base to livestock clearly shows the historic bias toward this special interest. Many of the BLM's management costs and "range improvement" costs would not be necessary were grazing given an equal rather than overwhelmingly dominant status of consideration. I urge the BLM to read Coggins and the Ferronous and begin to realistically face what is happening in the law and in the West today. Sheep are already largely disappearing from the public range, and cattle may well follow. Even with the subsidy it is very difficult to compete with high quality, efficiently run private sector operations. The BLM should take the AUMs as they are gradually released and use them for non-consumptive purposes. There is no law stating that 100% of every resource has to be milked, and in terms of ecosystem recovery and natural succession, even if wildlife won't be able to obviously crop every AUM it would be a boon to habitat to see less of it grazed.

Thank you for your consideration. I am attaching a model RMPA alternative set I constructed for the Shoshone District which I ask be included in the EIS record.

Sincerely,
Peter Bowler
Star Route
Bliss, Idaho 83314

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ratepayers, and will inevitably have large ecological consequences. Opportunity for other non-commodity public uses will be lost at these sites, and it would entail dewatering needed minimum streamflow levels in the Snake River through pumping. There is no way that this is in the public interest and one only has to look at boondoggles like Bell Rapids to see the fate that awaits. The last thing southern Idaho farmers need is more of this kind of largescale development. Other transferrals of title to the private sector should be very carefully reviewed. It is good and can be a positive consolidating move to eliminate some isolated tracts from public management, but the public is absolutely justified in being suspicious and cynical after the surplus lands swindle that was attempted in the early years of the Reagan Administration's first term. There should be public review opportunity for all of the transferrals.

Wilderness

I urge the Bureau to reconsider its proposed decision to recommend only 67,810 acres (32.2%) of the Bruneau-Jarbridge-Sheep Creek aggregate for wilderness designation. Insubstantial reason is provided for this decision, and it shows a lack of ecological vision and understanding of the cohesiveness and biological linkage of this wilderness quality habitat. By excising 114,550 acres of plateau land on the east side of the Jarbridge River, Sheep Creek and the Bruneau River, the National Wilderness Preservation System will lose opportunity for enriching its ecological diversity representation by excluding salt desert shrub habitat. Alternative D comes closest to a more natural, ecologically defined wilderness boundary system, but I support the most logical boundary definition, which is the enlarged boundary wilderness presented in the Committee for Idaho's High Desert's Alternative. This 340,000 acre concept encompasses all of the de facto wilderness lands that can be managed in the RA. The issue of management difficulty is vastly overplayed and is not adequate reason to shave wilderness acreages. In most cases these sites have not received much management to begin with and have certainly not been "managed" for wilderness character retention. The public would be better off in the balance of interests were these sites to be designated wilderness and the management through benign neglect course allowed to continue.

Management of the Snake River Riparian Corridor

Little management direction is clearly defined for the Snake River riparian corridor, despite its significance. The Lower Salmon Falls Dam tailwater to Bliss Impoundment and Bliss Dam tailwaters to around Clover Creek should be indicated as Excellent aquatic habitat on Map 3-7. As is recognized in Map 2-4, all of the BLM owned Snake River riparian habitat is in poor, burned or seeded ecological condition. Ironically, much of the privately owned land along the river, particularly on the north bank of the Wiley Reach, is in good condition and has a superior riparian formation of deciduous riparian woodland. Although exposures are different, there is no doubt that the south bank could be greatly enhanced were grazing AUM allocations for livestock reduced or were portions fenced. In Appendix Table B-1a, there should be another category added and the BLM should recognize that the Wiley Reach is a candidate National Natural Landmark which has been studied, reviewed, and found to qualify. Similarly, the Wiley Reach should be added to your Wild and Scenic River listing as 1/2 miles of mainstem Snake River. Alternative D, at least, should endorse designation for the site in these two categories. The Final E.I.S. should also discuss Dike II, a co-ownership proposal, which would dam the Snake River above Kinn Hill and which would flood a small amount of BLM land. In that context, there are additional sturgeon studies which should be cited, as Fish and Game has published population studies for

*But that figure does not include the Kinn Hill HSA 19-2, for which I strongly support wilderness designation. The BLM analysis and descriptions clearly show that this 29,309 acre HSA qualifies. I urge the BLM to recommend destination for all of this HSA or in lieu of destination as wilderness, make it an ACEC and manage it for wilderness character retention.

COMMITTEE FOR IDAHO'S HIGH DESERT
PO BOX 463 BOISE, IDAHO 83701

FOR HEARING RECORD

January 3, 1985

Mr. Gary Carson, Manager
Jarbridge Resource Area
Boise District BLM
3948 Development Ave.
Boise, Idaho 83705

Dear Gary,

The Committee For Idaho's High Desert, representing its several hundred members statewide, appreciates this opportunity to comment on the Jarbridge RMP/EIS Draft. Please include this testimony in the hearing record.

CIHD's concerns include but are not necessarily limited to the following matters, many of which have been addressed by CIHD in its earlier participation in the Jarbridge RMP/EIS process and other grazing and Wilderness Environmental Impact Statements.

TECHNICAL COMMENT ON DOCUMENT:

The RMP/EIS layout is rational and contains a well balanced mix of text and figures. The graphs and maps are of great value not only for current purposes, but also for future reference and research on other matters. The "pie cut" graphs (pages 4-5 to 4-8) are a welcome addition and should be used in future documents. Graphs and tables are very helpful in both main text and in the appendix. We suggest that thumb indexing (see Medicine Lodge RMP/EIS) is helpful and should be considered for future documents.

COMMENT ON RMP AND ADEQUACY OF THE EIS:

CIHD affirms its support for Wild and Scenic River status for the Bruneau-Jarbridge. We feel that additional reaches of the river system should be protected that were not included in the 121 miles recommended in the 1976 Interior study. CIHD is prepared to offer testimony to that effect during the appropriate hearings.

CIHD requests that the Final Jarbridge RMP/EIS compare the Bruneau-Jarbridge environment to comparable undammed desert river ecosystems in the United States, if any similar free-flowing rivers still survive. Management decisions must be based on the singular opportunity to protect this unique canyon and plateau complex from its Wilderness headwaters in Nevada to its junction with the Snake River. Few, if any, desert rivers of equivalent length and quality survive undammed in the arid West. This should be pointed out if the document is to be considered adequate for decision making purposes.

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114.1 Typically, the BLM has centered Wilderness recommendations on the river canyons and has written off the unique and ecologically significant plateaus or "islands" between the various branches of the Bruneau, Jarbidge, and Sheep Creek drainages.

114.2 The EIS does not adequately discuss the impacts of the RMP on terrestrial vegetation, specifically sensitive, rare, threatened, and endangered plant species of the plateaus. Cronquist (et al, Intermountain Flora) describes the Jarbidge complex as a corridor from the Northern Rocky Mountain ecological province that thrusts deeply into the Basin and Range province. The high desert ecosystem is widely regarded by others as perhaps the youngest ecosystem on the continent; one that is rapidly evolving in unique directions, and one that is very fragile due to its harsh physical environment and relatively unfilled species hierarchies.

How will the BLM identify rare terrestrial plants? Does the BLM routinely employ competent rare plant specialists? Does the BLM have a realistic grasp of the presence and locations of rare plant communities on the 1,690,473 acres of public land in this Resource Area? CIHD urges the BLM to outline specific plans in the Final RMP/EIS for a thorough scientific search for rare plants on the plateaus that will be impacted by the grazing increases recommended in the proposal, or justify why such a search should not be required.

CIHD applauds the BLM decision to establish an Area of Critical Environmental Concern for bighorn sheep habitat. CIHD requests that all bighorn habitat be monitored, to wit: all plateaus within a mile of the canyon rims, including the East Fork of the Jarbidge.

CIHD urges that Salmon Falls Creek be included in an ACEC to protect existing bighorn habitat in that area. CIHD strongly endorses the proposal to investigate with Idaho Fish and Game the possibility of re-introducing bighorns into Salmon Falls Creek. The Final RMP/EIS should include a timetable for implementing this investigation at Salmon Falls Creek.

We are skeptical of the BLM plan to transfer 91,446 acres of public domain in the Jarbidge RA to private ownership. While we believe that some exchanges and sales may be beneficial, we are not convinced that the BLM should allow 74,561 acres of agricultural entry. The ecological impacts will be substantial. These new croplands will compete with existing farms and will crowd livestock grazers onto smaller ranges, thus magnifying wildlife impacts. Water resources--already hotly contested--will be stressed further in southwest Idaho, as most of the irrigation water will be pumped out of the Snake River. Non-irrigation electric rate payers will be required to subsidize these new pumping costs to the tune of \$24.2 million per year (page 4-54).

The EIS should indicate the size of desert entries in the recent past in comparable situations in Idaho. It should indicate whether these entries were by individuals or corporations. It should establish a trend in size. It should indicate whether these projects were developed primarily

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by local initiative or by out-of-state interests. It should project impacts on the illegal alien situation on these large agricultural projects. It should describe anticipated impacts on local and federal law enforcement.

Typically, the EIS fails to describe impacts on local school districts, law enforcement agencies, fire protection agencies, and health and welfare agencies. No analysis of tax revenues vs. expenditures by local governmental units is provided regarding the new desert entries.

Sound business decisions could never be made on the quality and quantity of information provided in the RMP/EIS, yet the BLM is expecting that decisions involving the loss of 90,000 acres of land from the public domain will be made on the basis of this RMP/EIS. In defense of the preparers, this document contains better economic information than many we have seen. Yet, CIHD is continually amazed that decisions regarding thousands of acres of public land and millions of dollars in wealth can be made with so little regard to impacts on the local economies and people.

The RMP/EIS does not adequately address the 36 miles of riparian habitat in public ownership along the Snake River. Although the RMP states that the BLM will maintain the riparian zone in its present condition, the reviewer has no way of knowing:

- 1) What is the present ecological condition of the public riverfront?
- 2) What possibilities exist for restoring ecological integrity?
- 3) What is the present recreational use of the Snake River MUA? CIHD notes that these free flowing stretches of the Snake River are presently used for family and Boy Scout type rafting experiences.
- 4) What are the benefit/costs of the BLM proposal vs. alternatives that emphasize recreational or fish and wildlife benefits?
- 5) What effect will the BLM action have on the Wiley Reach of the Snake River? How will the Dike Reach be affected? Although public ownership is not complete in these areas, will proposed transfers affect access, visual resources, fish and wildlife, or cultural resources? Information for analysis of these concerns is available from the Interior Department's own National River Inventory by the Heritage Conservation and Recreation Service, and in the Wiley Dam FERC Environmental Impact Statement. The EIS should at minimum mention these resources, and point out that the Wiley Reach of the Snake River is a candidate National Natural Landmark.

CIHD supports efforts to restore and preserve aquatic and riparian habitat. We applaud efforts to fence livestock out of the streams and rivers so that the deplorable condition of these zones can be reversed. We are happy to see efforts being made to reverse the decades of shameless abuse of the East Fork of the Bruneau River (Clover Creek) by livestock grazers.

The BLM's proposed fencing does raise concerns for wildlife access to water, and the EIS should indicate fencing effects on wildlife, while the RMP should indicate how wildlife exclusions will be avoided. CIHD is strongly opposed to forcing wildlife to suffer injury as a result of attempts to correct the widespread riparian habitat destruction by domestic

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livestock. Moving the cows entirely away from the streams would be far better management.

The RMP fails to include plans to do a thorough search for rare or endangered plants and animals in the Bruneau-Jarbidge system. The EIS should indicate if such an inventory has ever been done. Regardless, what validity does the EIS have regarding rare aquatic plants and animals?

The RMP/EIS fails to mention the significance of the free flowing Bruneau River to the viable White Sturgeon population above the C. J. Strike Reservoir pool. CIHD is pleased that the BLM will coordinate with Idaho Fish and Game on actions affecting the Snake River spawning beds, but what of the Bruneau River? CIHD has reason to believe that adult sturgeon are present as high as the West Fork of the Bruneau. Has an inventory been done by BLM? How will the BLM's proposed actions affect this resource of the Bruneau. The RMP/EIS should address this concern.

The RMP/EIS fails to adequately discuss soil erosion. The RMP/EIS quite frankly is a joke. Although the preferred BLM alternative states that there will be no significant improvement with the BLM's actions (page 2-25), there is no site specific information except that it appears the BLM is dumping 118,000 acres of its most erodible soils (page E-1). CIHD notes that most of this acreage will go to agricultural development which reportedly will increase the rate of erosion at least ten times (page 4-3).

The EIS should describe the present rate of erosion in objective standards (tons/acre/year, etc.). What is the present and anticipated rate of soil formation under the BLM's proposal in objective standards? What is the rate of erosion by livestock allotment? How many tons of soil will be lost per acre and over the resource area as a whole over the duration of this RMP? What is the estimate of cumulative soil erosion since grazing began, in inches or tons/acre? How much loss of productivity will occur over the twenty years of the RMP in dollar amounts? What will be the impact of this RMP sanctioned erosion on the water storage capacity of Snake River irrigation reservoirs? What will be the impacts on hydroelectric generation due to reservoir sedimentation? The RMP fails to offer mitigation alternatives: requirements for irrigation settling ponds, requirements for fallow plantings, tilling restrictions, etc.

How can decision making proceed without this information? Does the BLM believe that the multiple use directives of 43 USC 1712(c)(1) and (4); and 43 USC 1702(c) which requires "harmonious and coordinated management of the various resources without permanent impairment of the productivity of the land" is being met? It would appear that the RMP/EIS is proposing management totally counter to the objective of the law in regards to soil erosion.

CIHD's photographic inventory documents the color of the Bruneau River during and well after the spring runoff. During summer thunderstorms the lower Bruneau River literally turns the color of a chocolate milkshake as countless tons of soil are lost in the runoff from the shamelessly overgrazed plateaus. The color difference at the confluence of the Bruneau

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River and Sheep Creek dramatically illustrates differences in suspended soil loads between the two streams. Has the BLM related these sediment loads to differing grazing practices (by different allotments) within the two drainages? The EIS must include a site specific analysis of grazing produced soil erosion if it is to be taken seriously.

A review of the RMP bibliography did not reveal specific references for soil erosion. If the BLM's information is from the cited works, it should be indicated.

CIHD notes with alarm the interest in three new major powerline corridors to cross the resource area. CIHD will vigorously oppose any scheme to extend a new corridor through the essentially unscarred Bruneau River-Jarbidge River confluence. CIHD is astounded that plans are even considered to extend a corridor across Bruneau Dunes State Park (Map 2-2), or to expand the corridor through the critical environment of the East Fork of the Jarbidge River (page 3-3). Both southern corridors would be visible from within the proposed Bruneau and Jarbidge Wilderness Areas. Both corridors would severely impact the essentially roadless de facto wilderness of tens of thousands of acres of public land. Due to potential impacts on Wilderness Study Areas that fall within the purview of Interim Management Policy guidelines, CIHD will expect to be notified of any BLM activities concerning planning for these powerline corridors.

CIHD specifically OBJECTS to the BLM proposal to open 86% of the resource Area to mineral exploration and development (page vi of the EIS). This is especially disturbing when the tiny area that is recommended for Wilderness is considered. The BLM is proposing only 52,022 acres of the vast Bruneau-Jarbidge-Sheep Creek complex for Wilderness. This represents only 28.3% of the Wilderness Study Area, and only 17.0% of the roadless de facto wilderness in the Bruneau-Jarbidge-Sheep Creek complex.

The BLM's tiny recommendation is only 3% of the Jarbidge Resource Area, 2/10 of 1% of Idaho's desert environment, and 1/10 of 1% of the State of Idaho. The tiny figure of 52,022 acres is absurd to any recreational user who is familiar with this country. The BLM IS RECOMMENDING FOR WILDERNESS AN AREA SMALLER THAN THE CITY OF BOISE!

We are not discussing Washington, D.C. The Jarbidge Resource Area is one of the least populated (and exploitable resource poor) areas in the United States. An examination of the Land Status Map (Map No. 2) in the RMP will give some indication of the level of human occupancy. If we eliminate the populated zone along the Snake River and Lower Bruneau River (total population less than 3,000 souls), we find that not one town exists elsewhere in the Resource Area. Only three tiny villages (population unrecorded, but on the order of a dozen souls each) exist at Roseworth, Ibres Creek, and Murphy Hot Springs.

370,465 roadless acres were identified during the Initial Inventory of roadless areas in the Bruneau-Jarbidge-Sheep Creek Complex. Only 17.0% of these identified roadless area has been recommended for Wilderness. (CIHD has included 11,680 acres of the Wilderness recommended Sheep Creek West in the roadless Bruneau-Jarbidge-Sheep Creek complex).

The following roadless areas were dropped from wilderness consideration:

NUMBER	NAME	DROPPED		RECOMMENDED
		INITIAL INVENTORY	INTENSIVE INVENTORY	
ID 17-1a	Lookout Butte	20,077 acres		
ID 17-1b	East Fork of Bruneau	10,178		
ID 17-6	Dry Lakes	26,208		
ID 17-11	Jarbridge River	35,670	27,951	47,389
ID 17-12	Poison Creek	13,532		
ID 17-19	Upper Bruneau River	21,711		
ID 17-21	Jarbridge Addition	5,881		
ID 111-17	Bruneau River	27,042	102,387	4,633
ID 111-36a	Sheep Creek West		3,696	11,680
ID 111-36b	Sheep Creek East		12,412	
		160,299 acres	146,466 acres	63,720
Total roadless acres dropped:		306,745 acres		
Roadless acres inventoried:		370,465 acres		
CIBD Wilderness recommendation:		340,000 acres		

The loss of over 306,745 acres from wilderness recommendation in the Bruneau-Jarbridge-Sheep Creek Complex, and the ludicrous recommendation of only 4,633 acres of the spectacular 404 mile long Bruneau-Sheep Creek Wilderness Study Area calls into question the BLM's entire Wilderness review process. The Jarbridge RMP/EIS will stand as a watershed document on the BLM's credibility if left in its present form.

Rim to rim Wilderness for the Bruneau River and Sheep Creek will exclude the Salt Desert Shrub ecosystem from representation in the Bruneau Wilderness. This ecosystem is not well represented anywhere in Wilderness Study Areas. If the controversial Jacks Creek WSA falls to become Wilderness, then perhaps no representative of the salt desert shrub ecosystem will, in Idaho, make it into the national preservation system. The Final EIS should list other examples of the salt desert shrub ecosystem under consideration in other Wilderness Study Areas. The table J-3 does not break out state or topography in meaningful form.

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The BLM proposal to exclude the eastern plateau of the Jarbridge River is irrational. The BLM maintains that potential vehicle access would prevent management problems on the east plateau, but there is ample precedence for dealing with low grade ways and roads within Wilderness Areas.

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The proposed Wilderness boundary will expose the visual resources of the west plateau within the Jarbridge Wilderness to degradation by actions on the east rim and plateau. The RMP lacks site specific information on the 37 miles of pipelines, 72 miles of fence, 29,400 acres of burnings, and 11,650 acres of reseedings proposed for MUA 6 (Saylor Creek west) and MUA 11 (Inside Desert). Both of these units are visible from the rim of the Bruneau-Sheep Creek proposed Wilderness. The Inside Desert MUA will certainly be visible from within the Jarbridge Wilderness plateau on the west rim of the Jarbridge.

Given the BLM's deplorable record on adhering to guidelines for various eyesores (i.e., the 40 foot wide bladed roads and four foot high barns that distinguish the pipelines on the Sinclair allotment between the Bruneau and Sheep Creek), site specific information for the listed range actions must be included in the Final EIS. Will the architect please note that this is an example of why conservationists are so upset by the threatened loss of such areas as Lookout Butte (ID 17-1a) and Dry Lakes (ID 17-6) during the inventory process for Wilderness. Will the BLM please refer to the December 22, 1983 letter from CIBD commenting on the Jarbridge RMP Draft Alternatives, concern No. 16 (a copy is enclosed with this comment).

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The plateaus being dropped from Wilderness protection are home to antelope and mule deer, and bighorn sheep will graze a mile or more from the canyon rims. Good native grasslands are present along the plateau margins. With BLM's past history of wildlife forage (mis-)allocations, only Wilderness is likely to protect the wildlife of the Bruneau, Jarbridge, and Sheep Creek Plateaus.

CIBD will promote a 340,000 acre Wilderness Alternative that preserves the visual, wildlife, and recreational resources of this totally unique desert complex. CIBD offers up about 100,000 roadless acres of this complex for development, as well as 1,250,000 acres elsewhere in the resource area. This will be known as the Conservationist's Moderate Wilderness Proposal to distinguish it from the extreme position of the BLM.

CIBD specifically endorses the proposal by Nevada Fish and Game to reintroduce elk into the Jarbridge country, and has provided that agency with testimony on that proposal. We approve of BLM intentions to provide elk forage if the reintroduction proceeds. We suspect that after decades of livestock grazing and taxpayer subsidized range manipulations, the Jarbridge elk range is more suitable for elk today than it was a century ago. The BLM's obsession with converting browse range to grazing range should be allowed to work to the benefit of wildlife on occasion. The Final RMP/EIS should include a map of all potential elk habitat in the southern portion of the resource area.

Should excess competition between elk and livestock occur, the RMP should specify either that 50% of forage be allocated to elk, or that the livestock be removed from the elk range. This is consistent with 43 USC 1701, 43 USC 1702, and 43 USC 1751. 43 USC 1702 gives equal weight to the forage

needs of wildlife and livestock, and most specifically does not dictate that livestock forage needs should be given preference over wildlife. Where forage needs are highly competitive, as with elk and livestock, both species should be allocated equivalent use by weight of the available forage. As livestock grazing is pervasive throughout the Jarbridge Resource Area, removing livestock entirely from elk range would be consistent with the directives in 43 USC 1702. A reading of the RMP language on page 84 reveals a bias in favor of livestock grazing over elk.

In the Jarbridge RMP/EIS we again see an incredible allocation of public natural resources and tax dollars to a single use, namely livestock grazing. Despite the many pages of data, the interesting descriptions and explanations, the thoughtful maps, and the obvious dedication of the BLM workers, the Jarbridge RMP/EIS remains a grazing document with a thin veneer of multiple use.

In particular, the BLM has failed to provide site specific wildlife forage data as requested by CIBD in its December 1983 comments on the Jarbridge RMP preliminary draft alternatives. Neither CIBD nor the general public has a clue to the wildlife carrying capacity of these ranges because the BLM has consistently failed to provide this information. CIBD has grown weary of the BLM's failure to respond to repeated requests for wildlife forage data. (Please check your files for requests/protests by CIBD and others regarding the Bruneau-Kuna Grazing EIS, the aforementioned Tentative Draft Jarbridge RMP/EIS, and the Poison Gulch appeal, among others).

The BLM can account for every pound of livestock forage. Every livestock AIM is listed for each of the 86 allotments or the 16 Multiple Use Areas. Yet the BLM is unable or unwilling to provide corresponding forage figures for wildlife on the public range. Nowhere does the document list the "Wildlife Unit Months" available on those ranges. Instead, the public is forced to accept wildlife population "goals" and competitive forage allocations without supporting data. The public is forced to accept BLM conclusions without insight into rationale, methods, or data. The public is left to wonder about the true wildlife potential of the Resource Area and its sub units.

Either the BLM has wildlife forage data or it does not. If it does not, then it should develop that data to be in compliance with 43 USC 1701, 43 USC 1702, and 43 USC 1712. CIBD believes the BLM must have that information, however, as it must have used soil, precipitation, and vegetation information to develop the livestock forage allocations. The BLM followed some methodology in determining its wildlife goals, but apparently is not willing to present its wildlife forage data for public scrutiny and independent analysis. Again, we urge the BLM to generate and include the figures for wildlife forage potential for the Resource Area in the Final EIS.

CIBD requests this information as it appears that the wildlife resource is being compromised to livestock grazing. CIBD is incredulous that the BLM intends to manage for only 1370 year-round pronghorn antelope on the 1,590,473 acres of public land in the Jarbridge Resource Area (page 2-26). THAT WILL BE ONLY ONE ANTELOPE PER YEAR ON 1213 ACRES. MEANWHILE THE BLM WILL BE ABLE TO FEED A COW AND CALF ON ONLY 5.9 ACRES PER MONTH OR 70.8 ACRES PER YEAR (page 4-43), EVEN THOUGH AN ANTELOPE EATS ONLY 1/9.4 AS MUCH AS A COW! *

$$\text{antelope: } 1,690,473 \text{ Acres} / 1370 \text{ antelope / year} = 1233 \text{ acres / antelope / year}$$

$$\text{cows: } 5.9 \text{ acres / month} / \text{cow} \times 12 \text{ months / year} = 70.8 \text{ acres/year/cow}$$

ANTELOPE, THEREFORE WILL BE ALLOCATED LESS THAN 1% AS MUCH FORAGE AS COWS. CONVERSELY, COWS WILL BE ALLOCATED 117 TIMES AS MUCH FORAGE AS ANTELOPE.

$$\text{cows: } \frac{211,425 \text{ AIMs}}{\text{year}} \times \frac{800 \text{ lbs forage}}{\text{AIM}} = \frac{214,140,000 \text{ lbs forage}}{\text{year}} = \frac{108,570 \text{ tons}}{\text{year}}$$

$$\text{antelope: } \frac{1370 \text{ antelope} \times 85 \text{ lbs forage}}{\text{antelope month}} \times \frac{12 \text{ months}}{\text{year}} = \frac{1,397,400 \text{ lbs}}{\text{year}} = \frac{698 \text{ tons}}{\text{year}}$$

$$\frac{3160 \text{ winter antelope (page 2-26)} - 1370 \text{ year-round antelope}}{1790 \text{ winter only antelope}}$$

$$\text{antelope: } \frac{1790 \text{ antelope} \times 85 \text{ lbs forage}}{\text{antelope month}} \times \frac{3 \text{ months}}{\text{year}} = \frac{456,450 \text{ lbs}}{\text{year}} = \frac{228 \text{ tons}}{\text{year}}$$

$$\text{antelope: } 698 \text{ tons / year} + 228 \text{ tons / year} = \frac{926 \text{ tons/year}}{108,570 \text{ tons/year}} = 0.0085 = 0.85\%$$

$$\text{cows: } \frac{108,570 \text{ tons/year}}{926 \text{ tons/year}} = 117 \text{ times as much forage, cows over antelope}$$

* All forage figures are from Appendix table B-2, "Forage Consumption for Ungulates"

Bruneau-Kuna Grazing Environmental Impact Statement Draft, U.S. Dept. of Interior, Bureau of Land Management, Boise District, 1982

Only in the de facto wilderness of the BrunEAU-Jarbridge-Sheep Creek Complex do wildlife forage allocations (approximately 3000 AUMs) and livestock forage allocations (6178 AUMs) come close to being balanced (page 44). This is perhaps the strongest argument available for the need for wilderness protection.

With 48.3% of the range in the resource area in poor condition and only 2.1% in excellent condition (page F-7), CIHD is, to put it mildly, skeptical of the proposal to increase livestock use 60% or 108,000 AUMs (page 4-44). Fully half of this increase (57,021 AUMs) is to be gained by redistributing livestock into range areas that are currently lightly used (page 4-44). Presumably this means into areas that have heretofore been available to wildlife without heavy livestock competition.

The EIS virtually ignores the impacts of this increased grazing stocking rate on small non-game wildlife and native vegetation. What for example will be the impacts on the small mammal-pronghorn relationship due to this 60% increase in grazing? The Final EIS should explore this concern.

CIHD is concerned about range vegetation manipulations. Wildlife can benefit from range actions, but in most cases wildlife have been incidental beneficiaries of such actions, and every conservationist has a favorite horror story of range action gone awry (virtual extermination of an area's sage grouse population by a few hunters at stock watering reservoirs is a good example). Range actions are overwhelmingly directed toward livestock in this RMP.

The BLM plans to spray 12,000 acres of the resource area with herbicides. It will burn 15,367 acres. It will do seeding on 34,040 acres--the bulk of which will presumably be created wheatgrass monocultures that are fine for livestock but dubious for browsing deer and pronghorn antelope (4-44). Please indicate in the Final EIS how much range will be altered to improve vegetation for wildlife as a primary consideration.

CIHD is fully aware that forage is not necessarily the limiting factor for wildlife populations. If lack of thermal cover is the limiting factor, then we would expect the BLM to work toward protecting sagebrush stands rather than converting them through herbicide spraying and burning into cow pastures. We would expect the riparian zones to be restored from their cow trashed condition throughout the resource area (page 4-13, 4-48, Map 3-6). Gap fencing may be a start in the right direction. Moving the cows entirely away from the streams would be far better.

If the limiting factor is winter range, then we would expect the BLM to offer alternatives for dramatically increasing the wildlife winter range, perhaps on or adjacent to the 76,561 acres of public land the BLM proposes to transfer to private ownership for agricultural development within the resource area. A surprisingly small area of irrigated land could sustain wintering wildlife. Two hundred acres of alfalfa, for example would produce as many tons of feed as the BLM plans to provide for antelope on the entire 1,690,473 acres of the resource area. Yes, CIHD realizes alfalfa would not be suitable for pronghorns, but this creative scenario may be very suitable for elk and should be explored in the Final EIS.

AS WE HAVE REPEATEDLY CALLED FOR THE SAME INFORMATION IN PREVIOUS DOCUMENTS, WE ARE BEGINNING TO FEEL THAT WE MUST SHOUT TO BE HEARD. THE JARBIDGE RMP/EIS DOES NOT CONTAIN SUFFICIENT ECONOMIC INFORMATION ON WILDLIFE, WATERSHED, SOIL, SCENIC, RECREATION, AND OTHER NON-CONSUMPTIVE VALUES TO ALLOW FOR CLEAR DECISION MAKING VIS A VIS DOMESTIC LIVESTOCK GRAZING AS REQUIRED UNDER 43 USC 1701, 43 USC 1702, and 43 USC 1751.

CIHD would like to finish its comment on non-grazing values with a statement by G.C. Coggins:

"The BLM's dilemma (about grazing allocations) is rooted in a history of its own making. For a generation the range managers were content to subordinate their professional judgment to livestock industry preferences and to ignore the Taylor Act's range improvement purpose... In a larger sense, however, the BLM's (post FLPLMA range improvement) striving backfired. The agency lacked the intestinal fortitude to reduce AUM allocations to levels at which improvement was likely or possible. Instead, BLM officials opted for the 'soft path' of physical improvements paid for by taxpayers without disaccommodation of the ranchers. The theory that money could solve all problems while avoiding unpleasant political repercussions was doomed. The ranchers could not be mollified so easily, the environmentalists had the fiscal ammunition to shoot down one-sided accommodations, and the law had progressed to far to contain unrealistic, one-dimensional management nostrums." *

In conclusion, CIHD find three major flaws in the Jarbridge RMP/EIS: FIRSTLY, resource values should be maximized, at least for study purposes. CIHD could support increased development in areas that have already undergone development, but only if resource values in less developed areas are preserved and restored. Wildlife, watershed, soil, scenic, ecological, recreational, and other non-consumptive values must be enhanced greatly if the BLM proceeds with plans to spend unspecified millions of dollars toward development in the Resource Area.

SECONDLY, the Wilderness boundaries must be enlarged. CIHD is not willing to accept 17% of the de facto wilderness in the BrunEAU-Jarbridge-Sheep Creek Complex. This would appear to violate the adequate range of alternatives doctrine of the well known State of California vs. Block decision.

THIRDLY, the forage allocation figures must be put into believable terms that remove the apparent livestock grazing bias over wildlife.

Please note that these comments are an expansion of testimony presented by CIHD on November 28, 1984 at the Boise Public Library. We will be submitting additional comments from time to time. Best wishes on the progress of the RMP.

*Coggins, G.C. 1983. The Law of Public Rangeland Management III: A Survey of Creeping Regulation at the Periphery, 1934-1982. Environmental Law 13: page 295-365.

Sincerely,

Randall E. Morris
Randall E. Morris, Chairman
Committee For Idaho's High Desert

For once, let the people who displace the wildlife (in this case the agricultural developers) pay the costs of mitigating the impacts they create. CIHD votes with alarm that the BLM plans to allow agricultural development to eliminate 24% of the native habitat within an eight mile radius of the Snake River between Sparfish Island and Hagerman (page 4-46).

We are astounded at the stranglehold only 86 permittees have on the public resources of 1,690,473 acres of public in the RA. We have observed from the public hearings that the ranching community represents the strongest opposition to wilderness designations, ADCO designations, elk reintroductions, ecological restoration, and wildlife population increases. Yet data on page 3-27 and 3-28 of the RMP/EIS indicates that grazing on the public's land in the Jarbridge RA produces only 1/4 of 1% (0.26%) of the total personal income of Elmore, Owyhee, and Twin Falls Counties:

\$1.9 million	from grazing on the public's land in the Jarbridge RA
\$744.3 million	Total personal income in Elmore, Owyhee, Twin Falls counties

$\$1.9 \text{ million} / \$744.3 \text{ million} = 0.26\%$

Indeed, grazing on the public's land yields only 5% of the total livestock income of the three county area! (page A-3). This would indicate that the incredible public expense for administering the archaic practice of grazing on the public's land is not returning significant income even to the livestock industry.

CIHD does not necessarily oppose all grazing on all public land, but again we call upon the BLM to adhere to its directives under 43 USC 1701, 43 USC 1702, 43 USC 1712, 43 USC 1732, and 43 USC 1751. The Jarbridge RMP/EIS does not begin to meet the criteria of multiple use planning.

Unbelievably, the document contains no alternative sources of income in the Jarbridge RA except for a brief analysis of proposed agricultural development. The Final EIS must contain income figures for hunting and outdoor recreation, currently and under the various alternatives. The document did not mention potential for wild game ranching or native seed harvesting for reseeded projects. What is the value of soil and watershed protection under the various alternatives? How does the present and potential value of wildlife compare to domestic livestock under the various alternatives? Even at \$100 per wildlife animal (low when we consider recreational expenditures by sportsmen) the value of the 3000 year-round deer and pronghorn is substantial, not to mention upland game birds and migratory game birds.

What is the potential sustained yield value for wildlife if livestock were removed? How can the overbalanced emphasis on domestic livestock be compared to wildlife values without information on potential wildlife numbers? We do not feel that the Director, Secretary, or Congress will find sufficient economic information in the document to make a prudent or businesslike decision on the expenditures of public monies. What will be the taxpayer's costs under the various alternatives?



Magic Valley Trail Machine Assn., Inc.
Conservation • Courtesy • Safety

January 3, 1985

Department of Land Management District Office
3948 Development Avenue
Boise, Idaho 83705

Reference: Draft - Jarbridge Resource Management Plan

Gentlemen:

As has been historically typical, you have been extremely unrealistic with vehicle restrictions in virtually all of your alternative proposals, thusly making none of them acceptable as offered. Vehicle restrictions appear to be primarily subjective and generally lack convincing evidence of need. Your non-motivated prejudice is hanging out a mile. Much could be said about why this pattern occurs but suffice it to say that the kids have learned their University lessons well from the Sierra Club faculty.

We the citizens, however, still say the words to support our 'hired land custodians' and the more you push for these types of restrictions, without valid reasons, the more the everyday citizen will recoil in protest of the government regulations, eventually tumbling the ivory tower.

Management-by-exclusion is not acceptable and will ultimately lead to legal confrontation. You may well find enforcement difficult, as well, when you do not have the 'heart' of the citizen-user behind your regulations.

The stance position of the WTHM Board of Directors, as representing the unanimous opinions of the membership, provides you with an unequivocal objection to any Wilderness recommendation within the Jarbridge Resource Area. In this regard we will request of our Congressional Delegation a reduction in funding to the BLM commensurate with the percentage of the area finally established as wilderness by Congress. This is appropriate since wilderness, according to the Act of 1960, should not require management as is presently provided for the Area and therefore funding should proportionally be reduced if the BLM's management task within the Area is reduced.

All of the USA's identified in your proposals lack some or all of the characteristics required by the Wilderness Act. They also lack most of the features sought after by Wilderness advocates in that the majority of the proposed land areas would be virtually inaccessible without vehicular assistance.

Therefore, the recommendation of the WTHM is to adopt your Preferred Alternative 2 with amendments as follows:

- 1) Manage the area generally as Multiple-Use and thusly provide for the maximum of efficiency and return on our Natural Resources in the form of both social and economic values.

Mr. Joe Zimmer
Boise District Manager
3948 Development Drive
Boise ID 83705

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Dear Sir:

I wish to comment on your draft Jarbidge RMP. I am disappointed in the document. It seems to lack an appreciation of the tremendous ecological and recreational values of the RMP area. Perhaps the problem stems from the Goal of this Draft Plan (pages iii and 19). Why, when FLPMA defines multiple use in terms of resource values, is the Goal of this Draft Plan balanced "resource values... and development"? Why are critical multiple uses such as recreation, wildlife and fish, and natural scenic, scientific, and historical values not even mentioned in the Goal of this plan, when all these values can be supported and strengthened with almost no adverse impact to the current environment? The Goal of this Draft Plan should be modified in the Final EIS to include the full range of multiple use values as specified by FLPMA, 43 USC 1702(c).

I am very disappointed in the recreation sections of the plan. There is a critical shortage of developed campgrounds in this RMP area. There are three public campgrounds, two in State Parks. There is a single BLM developed campground, which isn't even mentioned in this plan. There are no BLM semi-developed campgrounds. According to the 1983 Idaho State Comprehensive Outdoor Recreation Plan (SCORP), Owyhee County alone will have projected needs for 701 additional campsites by the year 2000, well within the projected life of this Plan. FLPMA specifically requires every effort to comply with such State government recreation plans. How does this Draft Plan make any effort to meet this legal requirement? Please give a specific answer to this question in your Final Plan.

There is certainly not a lot of money in BLM's budget for campground creation. There is a lot of money for range improvements. While BLM is awaiting funding for developed campgrounds, it must meet its share of this large anticipated need for campsites by using range improvement funds to control movement of livestock for multiple use purposes (PRIA). Five-acre areas at currently used campsites, and at promising sites for future campsites, should be fenced off from all cattle and sheep grazing, with cattleguards at entrances. Simple signing and fencing are sufficient for the present--although funds must be sought for developed recreation sites. Such fencing can and should be integrated with plans to fence off riparian areas.

Simply saying that SRMA's will be created in a few places is not enough. This final Plan needs specific language that meets the SCORP-identified campsite need. A few places that could support good campsites are Bennett Hills, East Fork Jarbidge roadhead, Bruneau Canyon where it enters the valley, Clover Crossing, several Birds of Prey sites, Snake River above King Hill, and a lot of places I haven't been--not to mention campsites near ORV areas.

Simply saying that areas are campgrounds is not enough. The Final Plan must call for them to be fenced off, with easy access over cattleguards, and not grazed over.

Your analysis of recreation use levels under the various alternatives is severely flawed. Please cite one professional paper that says that, no matter how lousy the ecological condition of the land, and no matter how many acres are transferred out of public ownership, recreation use in a region will remain exactly the same just because a projection says so for an entire state. It is much more likely that under Alternative C, with a 31% increase in grazing on 5% less land, recreational attractiveness of the area will be much lower than under Alternative D, with "only" 15% more grazing on the same amount of land. The increased presence of cattle on the land, with their fecal pollution, greatly detracts from recreational use. Recreation use figures should be adjusted at least 25% up for Alternative D above Alternative C.

I have a few more general comments. I support the Committee for Idaho's High Desert's wilderness recommendations, for wilderness for 340,000 acres of canyon and plateau. Canyon scenery is best appreciated from canyon rims. There are already all the vehicle-accessible overlooks in non-wilderness settings that anyone, even the elderly, could want. Seedings and vegetation areas in poor condition, when viewed from one rim, detract from the canyon views. These seen areas on plateaus should be made wilderness. Further, the wildlife areas on the plateau adjacent to canyons need wilderness protection.

I also support wilderness for the King Hill area. Super wildlife and hiking country which will fill a need for desert wilderness close to Boise.

I urge that you pay very careful attention to the needs of bighorn sheep, especially in the Salmon Falls Creek and East Fork Jarbidge areas. Both these areas are due for greater appreciation by the public. Bighorns will only add to their glory. Bighorns in these areas can coexist with humans if nearby plateau lands are also protected.

I continue to support Wild and Scenic River status for the Bruneau-Jarbidge system.

Bring back the Jarbidge elk. We need data on how elk behave on a complete, pristine, mountain-desert summer-winter ecosystem.

Thank you for the opportunity to comment on this Draft Plan. Please make the necessary adjustments on your recreation numbers and plans. People are not far from realizing just how special this high desert country is. They will need facilities and help as they learn to recreate in it.

Sincerely,

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Sheldon Bluestein

Sheldon Bluestein
Box 1852
Boise ID 83701

← page 227

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4 January 1985

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Mr. Zimmer,

I completely support the Committee for Idaho's High Deserts proposals concerning both the Jarbidge/Bruneau Wilderness and the King Hill Wilderness areas.

Thank you for your attention.

Sincerely,

Kristin Fletcher
Box 208
Ketchum, Idaho
83340

U.S. ENVIRONMENTAL PROTECTION AGENCY
REGION X
1200 SIXTH AVENUE
SEATTLE, WASHINGTON 98101



MAIL ROOM M/S 443

JAN 1985

Gary Carson
Area Manager
Bureau of Land Management
Boise District Office
3948 Development Avenue
Boise, Idaho 83705

Dear Mr. Carson:

We have reviewed the Draft Environmental Impact Statement (DEIS) for the Jarbidge Resource Management Plan. The DEIS analyzes four alternative plans for managing 1,690,473 acres of public land in southwestern Idaho.

Under the preferred alternative the DEIS states that livestock levels would increase by 66 percent over current levels. Also, 1,086 acres will be available for timber harvests. The Final EIS should explain whether water quality standards are currently being met and how water quality standards compliance will be affected by each alternative. The DEIS states that water quality will be monitored for mining and forestry activities. Water quality should be monitored for grazing activities as well. The Final EIS should identify the parameters to be evaluated and frequency of sampling. Also, how will the monitoring information be used to make changes in management practices if standards are being threatened?

Based on our review, we have rated this DEIS LO (Lack of Objections) in accordance with our responsibility under Section 309 of the Clean Air Act to determine whether the environmental impacts of proposed Federal actions are acceptable in terms of public health, welfare and environmental quality.

We appreciate the opportunity to review this report. Should you wish to discuss our comments, please contact Wayne Elson of the EIS and Energy Review Section, at (206) 442-1826.

Sincerely,

Robert S. Burd
Director, Water Division

cc: 100
F&WS, Boise

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Idaho Wool Growers Association

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Salmon

Martin J. Zimmer
District Manager
BLM, Boise District
3948 Development Ave.
Boise, ID, 83705

Dear Mr. Zimmer,

The Idaho Wool Growers Association is appreciative of this opportunity to submit comments regarding the Draft Jarbidge Resource Management Plan and Environmental Impact Statement, August 1984.

The comments from this Association will be broad in scope leaving the more detailed and in-depth concerns to be addressed by those members of this Association who actually live and/or depend on this area as an integral part of their livelihood. It is these people who will be most affected by the decisions made in the final document. We urge the BLM Boise district to work closely with these people, to address their concerns and to reach agreements with them prior to the release of the final document.

The document addresses the exchange of lands between the Bureau of Land Management and the State of Idaho. This Association is opposed to any exchange of lands until several areas of concern are addressed. These include:

- 1) The difference in grazing fee rates between BLM and state managed lands. Because of the economics of the livestock industry the past few years, many operations would not be able to continue if they were to suddenly possess a large amount of state lands in their operations where before they were BLM lands. Many operations have a very delicate economic balance that has been developed over many years. If the Bureau is to proceed with the blocking of lands, close consultation with those affected permittees will be necessary with some plan to address the economic hardships placed on permittees to be in place.
- 2) BLM permits have tenure whereas state permits do not. Permittees of state lands find their permits put up for conflict bid which could jeopardize the entire operation if the permit in question is the key range to the operation.

January 2, 1985

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3) BLM permits generally possess greater economic value than state permits. This is primarily due to the tenure aspect of BLM permits. Many livestock operations reflect this permit value on their financial statements in order to secure their annual operating loans. A change in this permit value could drastically affect monies available to livestock operations from lending institutions.

This Association is concerned with the 94,199 acres proposed in preferred alternative C as wilderness. Wilderness simply does not permit sound and proven range management techniques to be employed. It will limit historic use of the area and, because of the terrain, will be virtually impossible to enforce. Many roads are in existence in the proposed wilderness areas that are regularly used by the public as well as permittees. The terrain of this area is such that extensive planning and road work was not necessary to keep these roads useable. In many cases these roads have been termed "ways" by the Bureau thus allowing the area to be considered for wilderness designation. This Association urges the Bureau to study in-depth the many "ways" these proposed wilderness areas possess and the value they have to the public and permittees of the area. Noxious weed control is a major concern to those entities involved in the health of our public rangelands. Wilderness designation would not allow a comprehensive and effective weed control program to be employed.

The Environmental Impact Statement dwells extensively on game animals in regards to present number and goals. The document, however, does not explore the contribution private lands in the area provide to the wildlife populations. No A.U.M. figure is given for forage consumed by game animals on private lands.

The Environmental Impact Statement on page 3-10 states "there is a proposal by the Nevada Department of Fish and Wildlife to reestablish elk in Nevada on the Humboldt National Forest." This Association questions whether an elk herd was ever "established" in the Jarbidge Resource area and would oppose such reintroduction where the Jarbidge Resource area would be required to provide habitat. The Idaho Department of Fish and Game's "Plan for Managing Idaho's Mule Deer Resources 1981-1985" states "the winter range in Unit 47 called the Big Island is in generally poor condition. Large number of deer migrate out of Nevada to the Big Island range but the exact origin of this herd is largely unknown."

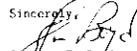
The plan indicates the current habitat in this area has largely reached its carrying capacity with only marginal mule deer population increases called for between 1981 and 1985. To introduce an elk herd in this area will only compete with the existing mule deer population and would most likely cause damage to privately owned resources.

Page 3.

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In general, this Association, and its members dependent on the Jarbidge resource area, have found the Jarbidge Resource Management Plan and Environmental Impact Statement to be a most confusing document. It is not well organized with many ambiguous and open ended statements present.

Again, to obtain the best plan possible the Bureau of Land Management is urged to work with the permittees involved with this area. These families, many of them second and third generations involved with the area, know the land, have cared for it, and are willing to work with the Bureau to the benefit of all involved.

Sincerely,

Stanley T. Boyd
Executive Director

Blaine, Idaho
State of Idaho
Secretary of State
Boise, Idaho

Wesley W. Wright, Executive Director
Idaho Wildlife Federation
1000 N. 10th St.
Boise, Idaho 83702
Loy Daly, Treasurer
1000 N. 10th St.
Boise, Idaho 83702



November 26, 1984

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Martin J. Zimmer
District Manager, Boise District
Bureau of Land Management
3948 Development Ave.
Boise, Idaho 83705

Re: Draft Jarbidge Resource Management Plan and Environmental Impact Statement, August 1984

Dear Joe:

The Idaho Wildlife Federation (IWF) appreciates the opportunity to comment upon the Draft Jarbidge Resource Management Plan and Environmental Impact Statement (Jarbidge RMP/EIS). IWF has a keen and abiding interest in the public land and its resources as embraced in the some 2,100,519 acre Jarbidge Resource Area (Jarbidge RA). It is our earnest desire that any management proposal applicable to these lands, their resources, and dependent life forms is truly one that will serve the public's interest, today and tomorrow. Unfortunately, we find the Jarbidge RMP/EIS seriously flawed in content, preferred management alternative, and assessment of impact(s) relative to achieving truly public interest management of the public lands within the Jarbidge RA.

We respectfully ask that the Bureau of Land Management (BLM) step back and look at what they propose, the land and its various resources, and the equally various publics those lands and resources serve, today and tomorrow. The Jarbidge RMP/EIS is a land allocation procedure and document. It does not, perhaps cannot, go into infinite detail of the allocation process, but sufficient detail must be given to enable those who review the process (the public, other state and federal agency personnel, etc.) a basis upon which to make their judgment call. Thus

- We commend the Multiple Use Areas (MUAs) and Management Prescription approach as means to present information. However, little data is presented in the document text and appendices to substantiate the "Objectives," "Multiple Use and Transfer Area Classes," "Actions" proposed. In effect we are asked to take that which is presented on

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faith. To do so is to rubber-stamp the material, hardly the intent of the Federal Land Policy and Management Act (FLPMA), the National Environmental Policy Act (NEPA) or other applicable law.

- We find the "Resource Management Guidelines," pp 71-93, as no more than rhetorical promises, an enumeration of "good intentions" without meaning. Put another way, the "guidelines" provide a shopping list of applicable activities which "may" or "will" occur at some point in time or under some circumstance - an open-ended declaration that accomplishes nothing. IMF, and we believe the general public, wants to know why, what, where, and how things are to happen on a definitive, time-certain basis.
- We ask that BLM value the wildlife and fish and other public land resources on an equal basis with livestock grazing, minerals, agricultural or other development/exploitation activity in the identity, assessment, and economic analysis of inherent public land resource values. The document looks at the farm and ranch communities, but nowhere does the document explore and evaluate the wildlife and fish (hunting and fishing), recreation, watershed, and other "goods and services" derived from the public land in any like manner. This is strange when considering that "recreation" is among the top activities contributing to Idaho's economic health while water is taken for granted and never "valued" in its critical role and contribution to domestic, urban, industrial as well as agricultural uses (perhaps an area of public land requires designation as a watershed due its critical role in water yield, water quality, aquifer recharge capabilities).
- We ask that BLM recognize that wildlife (fish, too) is first in time and use of the land (habitat) and that man's appropriation, conversion, or destruction of land (habitat) necessary to sustain diverse and viable populations of wildlife and fish has and is resulting in extirpation and/or reduced wildlife and fish resources. All the while livestock numbers and grazing scenarios have been given free rein (as aided and abetted by BLM and/or other federally-funded activities) in usurpation and direct competition (in terms of space, forage, water, and cover) in land allocation and use. The Jarbidge RMP/EIS further institutionalizes these processes. The document does propose "areas of critical environmental concern" (a commendable proposal) in recognition of certain problems, but ignores the larger issue of wildlife and fish management in terms of forage allocation and assurance of year-long habitat requirements.
- We ask BLM to consider well their projected land transfer(s) (and recognize that such classification and transfer of lands from public to private ownership poses serious doubt as to whether said transfer(s) serve the "national interest" as required by FLPMA, Section 102(a). Such land transfer(s) must be viewed relative to critical and declining water resources, economic return to and stability of Idaho's farming community and impact (on-site and off-site, immediate and cumulative) upon wildlife and fish resources, energy resources, designated wild and scenic rivers and other public resources and values. BLM cannot shirk these responsibilities in allocation of resources as is done in the RMP Plan/EIS.

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there will be no second chance to reconsider those resources lost in the rush to develop and exploit the public lands. IMF sees the Draft Jarbidge Resource Management Plan and Environmental Impact Statement as not serving the public good. Our review of the document results in the concerns, as have been enumerated, and as further portrayed in the following text.

I. THE JARBIDGE RESOURCE MANAGEMENT PLAN AND ENVIRONMENTAL IMPACT STATEMENT DOES NOT ADDRESS ALL REQUIREMENTS OF THE FEDERAL LAND POLICY AND MANAGEMENT ACT.

The thrust of the document with its selection of Alternative C as the preferred alternative ignores full consideration and assessment of resources within the Jarbidge RA. Alternative C is no more than a programmed exploitation of the public's land and its resources. The public's interest receives little more than token consideration. It is, instead, prostrated to the accommodation of agricultural, mineral, and livestock development and exploitation. This is done, notwithstanding the fact that the document documents well the hazards and folly of such development and exploitation. This thrust and accommodation is no surprise, however, when viewed relative to the goal of the Jarbidge RMP as stated at p 19.

A. The Jarbidge RMP/EIS fails to implement multiple use.

1. The Jarbidge RMP/EIS "Goal" fails the definition of multiple use as set forth in the FLPMA, Section 103(c). Multiple use, as defined in FLPMA, embraces a range of consideration(s) and use(s) that may bear on public land management with a concluding statement as follows: "... and harmonious and coordinated management of the various resources without permanent impairment of the productivity of the land and the quality of the environment with consideration being given to the relative values of the resources and not necessarily to the combination of uses that will give the greatest economic return or the greatest unit output."

The RMP, as has been demonstrated in prior text, does not achieve this mandate nor, for that matter, does the EIS. In fact, the EIS at p 1-1 would seem to contradict the RMP at p 19. The EIS, in discussing "Purpose and Need" is more acceptable to achieving what is mandated by FLPMA. The RMP "Goal" is totally unacceptable as it portrays a completely commodity-oriented land allocation process. In any event the Jarbidge RMP/EIS requires restructuring of its goals, purpose, and/or need to fulfill the requirements of FLPMA.

2. The Jarbidge RMP/EIS does not meet the mandate nor criteria outlined for development and revision of land use plans as found in FLPMA, Section 202(c). Items:

a. Although watershed is deemed a multiple use under FLPMA, the Jarbidge RMP/EIS is essentially silent on this matter relative to quality, yield, time of release, surface/subsurface flow, aquifer recharge, etc., associated with implementation of the Jarbidge RMP/EIS and its impact upon watershed functions/water factors as enumerated. BLM activities surely impact

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- We ask BLM to be up-front in their portrayal of implementation of Alternative C and its livestock grazing program. That is:

- 1) What are the parameters of the program, what is going to happen where, when, and why?
- 2) What are the anticipated impacts upon other resource values in both the near and long term, immediately and cumulatively?
- 3) What are the anticipated costs of the program and, really, who benefits?
- 4) Provide a clear emphasis and explanation of the fact that the proposed management scenario results in no significant improvement in range conditions twenty (20) years hence from that now evident within the Jarbidge RA.
- 5) Provide a clear emphasis and explanation of the fact that projected increases in forage production is predicated, primarily, upon planned brush control, seeding, and water/fencing "range improvement" activities at an undisclosed cost in range betterment or other public funds. And, that the primary, even sole beneficiary of this public largess are those livestock operators currently licensed to graze their livestock in the Jarbidge RA and at a fee of some \$1.37 per animal unit month.
- 6) Provide a clear emphasis and explanation of why it is prudent and in the public interest for BLM to implement Alternative C (or any similar alternative for increased forage production to accommodate livestock grazing) when:
 - a) the current preference of livestock operators licensed to graze livestock within the Jarbidge RA is 166,586 animal units (AUMs) use.
 - b) the "average" 5 year use by these licensed operators is 163,477 AUMs use, and
 - c) the Jarbidge RMP/EIS, Appendix Table F-1, shows present vegetative production for all MUAs totals some 261,439 AUMs.

It seems that present forage production is more than adequate to accommodate current preference. And, perhaps, with modest realignment of "management" and investment of funds, the current preference could be accommodated without invoking Alternative C or similar scenario. Why was not this addressed as an alternative in the Jarbidge RMP/EIS?

It is imperative that public land resource allocation, the Jarbidge RMP/EIS in this instance, fully identifies, addresses, and assesses the public land and its resources equally in their capability and contribution to accommodate and serve the public good. There is always time to exploit resources, but

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upon water quality, yield, time of release, etc. Likewise, such activities impact rates of infiltration, overland flow - surface and groundwater yield and flow. This is a factor of immense economic importance overlooked in the document. Furthermore, BLM cannot shirk its responsibilities in assessing the impact of proposed land transfers (Alternatives A, B, C, and D) in their effect upon available water resources, well and stream alike. To do so is to deprive the public means to grasp the significance of what is proposed and to weigh options. Therefore, these factors, impacts, and values require identity, assessment, tabulation, and presentation in the document for comparison, one with the other, and in comparison of other public land resource values.

b. Like watershed, wildlife and fish are deemed a multiple use by FLPMA. They receive much rhetoric, but little substantive attention in the Jarbidge RMP/EIS. To be sure, Areas of Critical Environmental Concern (ACEC) are proposed (this is commendable); the "Resource Management Guidelines," pp 80-86, enumerate many promises; and, various other sections of the document extol wildlife and fish as a major item of concern, but the bottom line is that precious little is done for wildlife and fish. Example: animal unit months (AUMs) or forage allocated to sustain and enhance wildlife in the Jarbidge Resource Area (Jarbidge RA), Table 2-5.

Of critical concern to the Idaho Wildlife Federation is the matter or determination of wildlife number and/or population estimates and projections applicable to the some 2,100,519 acre Jarbidge RA. It is a fact that the Idaho Department of Fish and Game spent much time, money, and effort in formulating their big game, nongame, waterfowl, and fisheries management plans. This involved much public input and participation of which IMF was a part. The Jarbidge RMP at page 95 asserts that the actions outlined in the RMP are consistent with the Idaho Department of Fish and Game population goals and fisheries management plan. Questions: What are such goals and management plan criteria? How does the RMP meet, modify, or ignore such goals and criteria?

Table 4-1, p 4-5, is titled "Current Big Game Populations and Reasonable Number Goals." Questions: How were these values derived? By whose definition or decision are reasonable numbers decided? How does this relate to Idaho Department of Fish and Game's goals and plans? And, finally, given the importance of Idaho's wildlife and fish resources in their contribution to Idaho's economy, why are not these values identified, tabulated, and presented in the document for economic and option comparisons with other public land resource values in determination of an appropriate land use plan in the public's interest?

II. THE JARBIDGE RESOURCE MANAGEMENT PLAN AND ENVIRONMENTAL IMPACT STATEMENT DOES NOT ADDRESS ALL REQUIREMENTS OF THE PUBLIC RANGELANDS IMPROVEMENT ACT.

The correlation between the Public Rangelands Improvement Act (PRIA) and FLPMA escapes BLM in the Jarbidge RMP/EIS. PRIA, in many respects reaffirms, redirects, or extends FLPMA in scope and application to management

of the public land. Drafting of a plan with land use allocation which ignores this mandate is not acceptable.

A. The Jarbidge RMP/EIS fails to implement PRIA.

1. The Jarbidge RMP/EIS ignores PRIA, Section 2(a), (1) and (2). The Jarbidge RMP/EIS, regardless of alternative chosen, Table 2-5, pp 2-25 through 2-28, does not result in significant rangeland improvement over the twenty (20) year planning cycle. To be sure, greater forage production is projected as predicated upon planned brush control, seeding, and water/fencing activities, but, in the end, nothing really changes relative to the vast majority of lands involved. Even Alternative D, the alternative that "emphasizes the maximum protection of the non-commodity resources" is, for all practical purposes after twenty years of "management," the same as the current situation. PRIA envisions more!

One could cite many other flaws in the Jarbidge RMP/EIS. Noncompliance with NEPA has been demonstrated, particularly as it relates to full disclosure of all resource values with appropriate assessment and consideration in the decision-making process. Another concern (flaw) is the use of procedures and terminology which is not explained in either terms of definition or rationale for its use, i.e., the allotment categorization (M.I.C.) scenario. At p 3-7 one finds the process has been completed with reference to Appendix A for presumably definition of how, who, and why this was done. Reference to Appendix A reveals nothing about M.I.C.! Table F-4 does indicate where M.I.C. falls, but beyond that M.I.C. is a mystery.

At p 3-6 one finds the statement "Trend information is lacking on most of the resource area." Surely you jest. The best, indisputable trend data available that is indelibly marked on the land is recorded in your Table 2-5, p 2-25, and labeled "Range Ecological Condition, Current Situation" as: Excellent 2%, Good 5%, Fair 9%, Poor 48%, Burned 12%, Seeded 22%, Misc. 2%. There is no better proof of the pudding. This above referenced statement is hokum and blatantly misleading.

Yet another blatantly misleading piece of material is found at p F-5 and is titled "Short-Duration, High-Intensity Grazing." This is not, to my knowledge, an accepted grazing system. Such a "system" used out of the context, time constraints, and principles of Holistic Resource Management, as developed by Allen Savory, assures tragic results with extensive resource degradation.

Finally, BLM is to be commended in its development of data, rationale, and proposals on Areas of Critical Environmental Concern, Special Recreation Management Area - Outstanding Natural Area, Birds of Prey, Wilderness and other special management areas. This is a step in the right direction. Question: Are they large enough to protect the areas involved and/or sustain the dependent life forms within? On wilderness a very good case has been presented to justify classification of the total acreages with no manageability adjustments. The plateaus adjacent to and intermixed with the canyons are

a unit, an ecological unit that must remain a unit to assure continued viability and diversity of life forms and life systems and character of the canyon/plateau complex. Rim to rim wilderness is not biologically sound.

And, one final comment has to be made concerning Alternative D). Again, you must jest. Removal of all livestock from the Jarbidge RA is not practical or reasonable, therefore warrants little comment. However, since BLM did propose such an Alternative, why didn't BLM fully explore and assess and quantify all the resources, the impacts, and the data base resulting from such a management scenario? Such information would prove invaluable as baseline data for comparison and judging all other management scenarios.

In conclusion, the Idaho Wildlife Federation finds the Jarbidge RMP/EIS unacceptable in its present form. It is seriously flawed, Alternative C does not serve the public good. Of the alternatives presented, Alternative D is the most palatable, but even it has many of the same flaws as Alternative C. It does, however, have the potential to accommodate the current preference of licensed livestock operators with, no doubt, a minimum outlay of public monies to achieve this end. Monies saved, therefore, over that incurred through implementation of Alternative C or similar scenario hopefully could be used to realize overall improvement of the rangeland environment in the Jarbidge RA so that in twenty (20) years conditions will have moved up the ecological scale in a far greater amount than is projected in the Jarbidge RMP/EIS.

Sincerely,


William R. Meiners, Chairman
Natural Resources Committee

WRM:mjm

cc: Bill Leisi, President, IWF
Russ Reughins, Vice President, IWF
Ed Stockly, Executive Director, INRLF
Johanna Wald, NRDC

The Wildlife Society

Western Section

Nevada Chapter



Founded 1937

The Wildlife Society

Western Section

Nevada Chapter



Founded 1937

Base District Manager
Bureau of Land Management

Dear Sir:

The Nevada chapter of the Wildlife Society submits the following comments on the Draft Jarbidge Resource Management Plan and EIS.

We agree that the "rim to rim" boundary for the Bureau/ Sheep Week Proposed Wilderness is best. The plateau areas outside of the rim do not lend themselves to wilderness management.

We agree that 92 miles of the Brunau River and 29 miles of the Jarbidge River be designated as Wild and Scenic.

We are concerned about the lack of mention regarding non game wildlife species in MUA-4 and MUA-5. Since canyon riparian habitat on public lands is limited some mention of the importance to non game should be made.

We are concerned about the comments made regarding sage grouse on pages 4-46. The DEIS states that habitat condition for sage grouse would remain essentially unchanged under the proposed plan. Approximately 50% of the existing nesting habitat is said to be in poor condition. We feel that



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sage grouse populations will continue to decline under this type of management.

On page 81 - How will utilization of shrubs on big game winter range be monitored?

On page 81 - How will shrub cover habitat for long-billed curlews be monitored? We know from information gathered in central Nevada that moderate grazing does not interfere with nesting, but range improvement projects do.

Part II, page 61, first paragraph - The statements made here represent the worst that could happen. Depending on how

The International Organization of Professional Wildlife Ecologists and Managers

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agriculture development was interspersed with native range, birds of prey might not be impacted as much as indicated.

Part III, page 3-14 - While we are not in favor of monotypic seedings, properly designed seedings may benefit wildlife species. Size and how the seedings are interspersed among native range need to be part of the project goals and objectives. (Whitby and Wagner, 1975, JRM 26: 349-352) reported high concentrations of jackrabbits adjacent to cropped shrubgrass seedings. Howard and Wolfe, 1976, JRM 29: 33-37 found that seedings in various stages of "reversion" to sagebrush may increase the probability that ferruginous hawks will

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produce young in years of low jackrabbit density, due to greater vulnerability of prey in these areas. The authors concluded that reversion to native vegetation in the seedings created suitable prey base habitat within 6 to 8 years following initial conversion.

Again, the increasing value of the seedings through time to wildlife needs to be addressed in the goals and objectives established for the project.

In general we support the preferred alternative. As activity plans are prepared especially for the proposed wilderness areas wildlife goals and objectives need to be established to provide for protection

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Page five



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or enhancement of wildlife in these areas.

Sincerely

Robert Mason
Chairman - Conservation
Review Committee

The International Organization of Professional Wildlife Ecologists and Managers

5-75

Page six

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January 16, 1985

Gary Carson
Jarbridge Area Manager
Boise District Office, B.L.M.
3948 Development Ave.
Boise, Idaho 83705

Dear Mr. Carson:

The location of special-use lands in the Jarbridge Resource Management Area creates a seventy-two (72) mile strip that cannot be traversed by utility lines. If the (Preferred Alternative) is adopted, it would prohibit any future utility lines from crossing these special-use lands between the Snake River and the southern Idaho border. Though the exact determination of where and when a utility corridor for future transmission lines, pipelines, etc. has not been decided, we request that a corridor through this area be established to allow for future transmission line requirements.

In 1976 a transmission line route was approved by the Idaho Dept. of Parks and Recreation and the U.S. Air Force for Pacific Power & Light Company's Malin to Midpoint 500 kV Line. The approximate location of this line is shown on the attached copy of Map #2-2 of the "Jarbridge Resource Management Plan". Though the actual line was built to the north of Mountain Home, Pacific still retains right-of-way easements for some of the private lands crossed by this line route. This line route could be a viable corridor for utility lines in the future. Therefore, we recommend that a utility corridor be identified and established to allow for future utility line needs.

Sincerely,

Howard C. Ferris

Howard C. Ferris
Transmission Design

HCF:sb
Attachment

TELECOPIER 243-4774 • TWX 910-666-1594



BLM- Boise District Office
3948 Development Ave.
Boise, Idaho

Jan. 16, 1985

135

Dear BLM :

Please accept my comments on the Jarbridge Resource Management Plan.

First let me state what I agree with and then I'll list my objections.

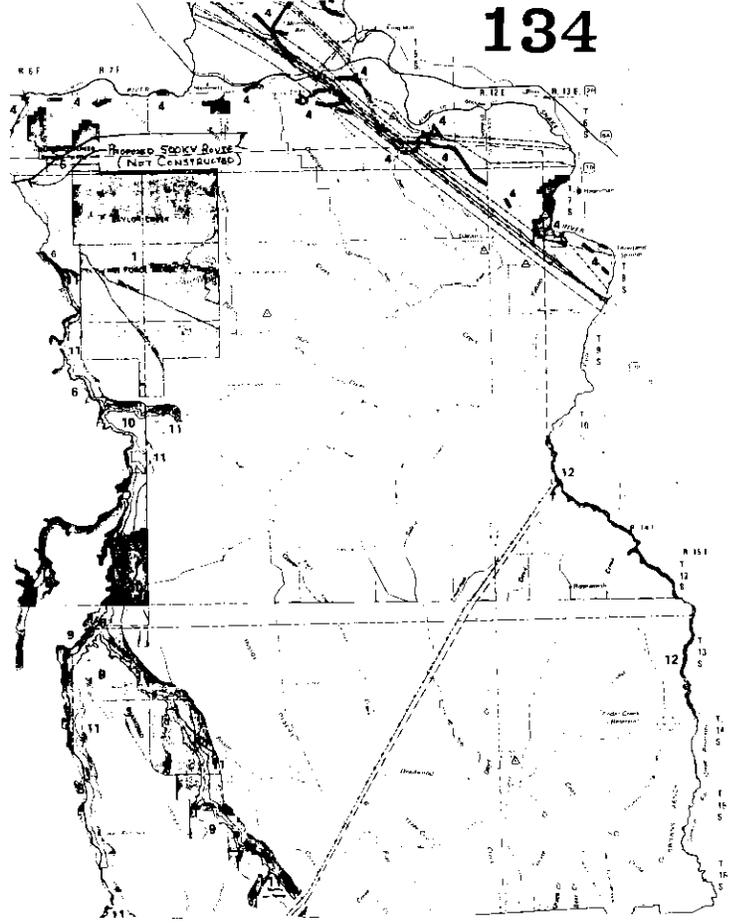
I support the establishment of King Hill, Bruneau-Sheep Creek and Jarbridge River Wildernesses. I'd like to see more of the plateau lands on either side of the Bruneau-Sheep Creek proposal increased. At least in some areas it would be nice to have a buffer zone of undisturbed land back from the river canyons themselves.

I also support the recommendation for Wild and Scenic River status for the Jarbridge and Bruneau Rivers. They meet all requirements of the Act and should be protected.

I also was glad to see your ACEC recommendations. I'm particularly supportive of the 80,994 acres proposed to protect sheep habitat. I fully support any sheep reintroductions. Cougar Canyon is a unique tributary of the Jarbridge River and deserves it's proposed ACEC designation.

Wildlife: I would like to see the BLM reestablish Elk in the Jarbridge Mountains. Habitat exists for them and they would add much to the fauna of the area.

I hope the Idaho Fish and Game will reintroduce more California Bighorns in other suitable habitat such as Sheep Creek. I support the proposals to limit water developments, cattle use, and human use in areas of known bighorn habitat.



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Wuerthner - page two
Box 7192
Missoula, Mt.

135

I object to the following:

First there is too great an emphasis placed upon the needs of livestock grazing. These are public lands not private cattle ranches. A quick look at your AUM allotments, proposed developments and other items shows a huge livestock bias.

There should be no significant water developments. First of all these usually cost much more to put in place than any money realized in additional grazing fees can justify. They are a fat subsidy to grazing interests.

Second, more AUM's should be allotted to wildlife. For the public at large, the BLM lands would be better served if they were managed primarily for wildlife- not livestock. Livestock could be accommodated- but only after wildlife needs were met.

I am shocked that you propose limiting elk numbers- rather than cattle numbers if elk numbers increase on the public lands to the point where range degradation results. If that be the case- get the cattle out. There are a lot of hunters out there. This is our lands. People like to see elk, including none hunters.

Rather than spend money on water developments, spend the money protecting riparian zones from livestock. Fence sensitive areas. Riparian zones in the Idaho desert are particularly important for wildlife and fisheries. Fencing could be done so cattle would remain out of most riparian areas, except for limited access for water. High grasses promote streambank stability, reduced flooding, increased habitat for small and large birds and big game species such as deer.

When seedings are done, do so with native grass species and a mixture- not crested wheatgrass. Native species have more value to wildlife.

There should be no land transfers. The U.S. gave away too much land already. Keep it for the future. No land give aways, sales, transfers, or trades, except for consolidation or other management purposes. 91,000 acres seems like way too much to be transferring out of federal ownership.

In general I support your alternative D. I believe the best use of the public lands would be to let it be managed in such a manner as to protect the natural environment. That should be the BLM's job. Wildlife, water, soil and wilderness values are the land's greatest values.

IDAHO DEPARTMENT of PARKS & RECREATION

2177 Warm Springs Ave., Statehouse Mail, Boise, Idaho 83720

(208) 334-2164

Robert L. Meinen, Director



John V. Evans, Governor

Wuerthner - page 3

135

Again I wish to emphasize my support for ALTERNATIVE D.

Sincerely,

George Wuerthner

February 13, 1985

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Mr. Gary Carson
Area Manager
Bureau of Land Management
Boise District Office
3948 Development Avenue
Boise, ID 83705

RE: Draft Jarbidge Resource Management Plan

Dear Mr. Carson:

Although the comment period has closed regarding the draft plan referred to above, we wish to inform you of our support for Alternative C. We also have a recommendation with regard to the management of the Hagerman Fauna Fossil National Natural Landmark.

First of all, we want to let you know that we're pleased with management plans that have a major effect on Bruneau Dunes State Park (MUA-5, Snake River Birds of Prey), and to lesser extent, our Three Island Crossing State Park (MUA-4, Snake River Riparian). We concur with efforts to protect and manage the Oregon National Historic Trail, designate lands near these parks as utility avoidance areas, and protect the visual and natural character of lands adjacent to Bruneau Dunes State Park.

Secondly, we agree with your proposal to designate the Hagerman Fauna Fossil National Natural Landmark as an "Area of Critical Environmental Concern". We feel that this area which lies within the most fossil rich formation in Idaho and possesses the richest fish fauna in western North America, is a significant part of our State's natural heritage. It deserves responsible management. We support the additional designation of this vicinity as a "Special Recreation Management Area". We recognize that there is a demand for ORV use in the Hagerman-Owsley bridge area. Under the SRMA designation, many areas will remain open to ORV use, while others near sensitive paleontological sites will be either limited or even curtailed.

We would recommend that these sensitive resource areas be managed by the National Park Service, since they manage similar national natural landmarks. Field personnel in the Hagerman area could conceivably be supervised from the Craters of the Moon administrative offices. Under

EQUAL OPPORTUNITY EMPLOYER

Mr. Gary Carson
February 12, 1985
Page 2

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this proposal, the security of the resource would receive the necessary level of attention. They may also be helpful in acquiring private lands along the rim of the canyon that overlap into the area of critical concern.

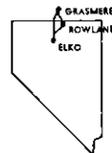
Thirdly, we're supportive of both proposals to designate the Bruneau River Canyon, rim to rim, as a wilderness area and designate the Bruneau River as Wild and Scenic. For more than 13 years, our department has been involved with others in studying ways and means of protecting these resources. The characteristics of the Bruneau Canyon and River should be protected as valuable natural, scenic, paleontological, and recreational resources. The value of the features identified in Table 3-13, Page 3-24, cannot be refuted. We support management policies necessary to maintain the quality of these natural resources.

We hope you will continue to inform our department about the status of recommendations found in the draft plan. Thank you for including us on your list of interested agencies.

Sincerely,

Robert L. Meinen, Director
Idaho Department of Parks and Recreation

mvd-0992H



HOWARD RANCHES, INC.

ROWLAND, NEVADA • 378 WALNUT STREET
Via GRASMERE, IDAHO 83625 • ELKO, NEVADA 89801
TELEPHONE ROWLAND, NV • (702) 738-6801

Bureau of Land Management
Boise, Idaho
Dear Sir:

Jan 3, 1985

When I try to study the management plan for the Jarbidge area I am extremely frustrated by the fact that after all the years and studies the money is still being spent for studies instead of land improvements on the land.

If 800,000 acres are in poor condition then it doesn't speak well for past management. If only a small part of this 'poor' land will get any treatment then the management will not be any better in the future.

When our allotment was fenced off from the main Diamond A, we were told that we had some extra AUM's over our customary use. We voluntarily

5-77

tried to develop a management plan and have taken considerable non-use to try to improve the abatement. Now, your alternatives mostly indicate we need a reduction in use. I disagree with this conclusion. Our abatement is in better condition each year of the last five years and will continue to improve. If the Bureau cooperates with us on water development it will improve faster. Any increase of water developments will benefit wild life as well as domestic livestock. According to George Sukamoto, Nevada Big Horn expert, there is no problem with cattle and Big Horn sheep in the same area. On page 68 it says bighorn and domestic livestock must be separated. The wildlife people must have had a lot to do with revising this mgmt. plan

If the public understood how few people could or would use wilderness areas the opposition to W.A.'s would overwhelm the people who want them. The silent majority is not being considered.

It will be to start spending more for range improvements instead of studies and piles of paper.

Ranchers are true environmentalists and are interested in improving habitat for wildlife as well as domestic livestock and have spent money & time improving public land conditions.

Wildlife would have a hard time surviving without using private land in many areas.

If Elk are introduced they will be a real problem for some ranchers in the winter months.

Thanks for the opportunity to comment. I hope all this results in better management and improvement of the resource.

Yours truly
 J.K. Howard

OVER



DEPARTMENT OF THE AIR FORCE
 REGIONAL CIVIL ENGINEER, WESTERN REGION (AFESC)
 630 SANSOME STREET - ROOM 1218
 SAN FRANCISCO, CALIFORNIA 94111

FEB 07 1985

TO: ROV (Lammi/556-6439)

FROM: Jarbidge Resource Management Plan (RMP) and Environmental Impact Statement

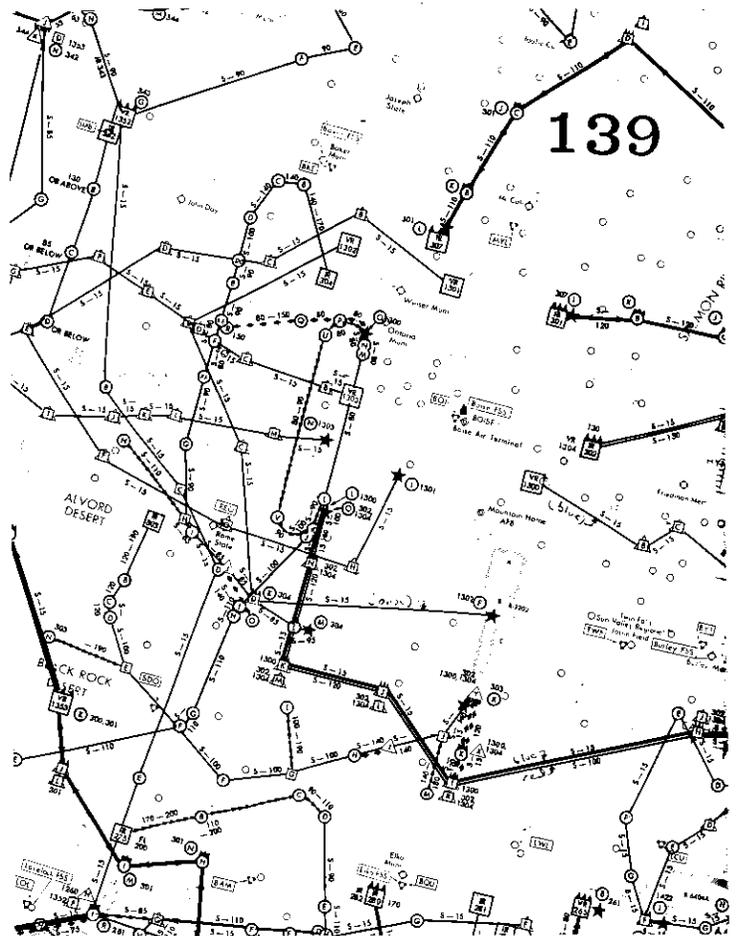
TO: Mr. J. David Brunner, Associate District Manager
 Bureau of Land Management, Boise District
 3948 Development Avenue
 Boise, Idaho 83705

1. We have reviewed the subject RMP and EIS and concur with your management alternatives found on map 2-1 provided that no restrictions are placed by your agency on our existing military overflights.
2. As you are aware, some of the Jarbidge Resource Area has historically been subject to military overflights, which should continue in the future. In the past, there have been no major problems between the Air Force and the Bureau of Land Management concerning military overflights over lands under your management.
3. The maps included in the subject documents recognize the U.S. Air Force Saylor Creek Range; however, no mention is made of the designated Military Operating Area R-3202 "C" adjacent to it. A map, extracted from the DOD Area Planning AP/18 Chart dated 25 October 1984, is included for your information.
4. We consider the Saylor Creek Range and Military Operating Area R-3202 to be valuable resources and overflights a compatible use of these resources. We hope you agree with us and will feel free to contact our office at 415-556-6439 if you have any questions.

139.1

Phillip E. Lammi
 PHILLIP E. LAMMI, Chief
 Environmental Planning Division

1 Atch
 AP/18 Chart





IDAHO AIR NATIONAL GUARD
 124TH TACTICAL RECONNAISSANCE GROUP
 BOISE AIR TERMINAL (GOWEN FIELD)
 P. O. BOX 45, MOORE, IDAHO 83707

140

Bureau of Land Management
 Jarbridge Resource Area/EIS

22 July 85

District Manager

1. The majority of the 94,199 acres in the three Wilderness Study Areas (WSA's) underlie a significant portion of the Owyhee, Paradise, Bruneau and Sheep Creek Military Operations Areas (MOA's), Saylor Creek Restricted Area and two Military Training Routes (MTR's), VR 1300 and VR 1301. The MOA's have vertical dimensions from 100 feet above ground level (AGL) to ceilings ranging from approximately 6,00 feet AGL to 17,000 feet AGL. Saylor Creek Restricted Area has vertical dimensions of 100 feet AGL to approximately 10,000 feet AGL. VR 1300 and VR 1301 have vertical dimensions of 100 feet AGL to 1,500 feet AGL. Aircraft in the aforementioned areas fly ground speeds in excess of 600 knots. The MOA's, Saylor Creek and MTR's are scheduled by 366 TFW/DOTV (366 Tactical Fighter Wing) Mountain Home AFB, ID, and 124TRG/DO (124 Tactical Reconnaissance Group) Boise, ID, respectively, and are used by numerous Air Force, Navy, Marine, National Guard and Reserve Units. Last year approximately 365 124 TRG missions were scheduled in the MOA's and 1178 missions were scheduled in the MTR's. The usage of the MTR's, MOA's and Saylor Creek has steadily increased since their creation.

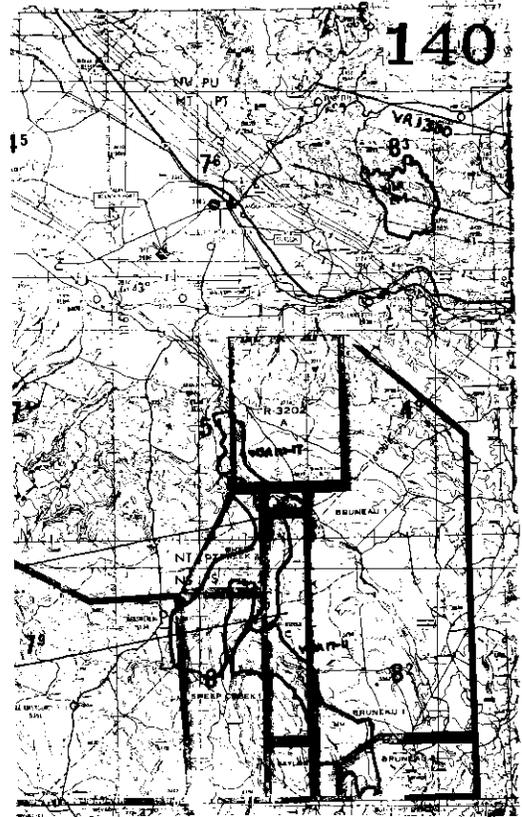
2. When MTR's and MOA's are established, noise sensitive areas and low altitude civil aircraft activity are considered and avoided to the maximum possible extent. For these reasons many remote and sparsely populated areas administered by National Park Service, U.S. Fish and Wildlife Service, Bureau of Land Management and or U.S. Forest Service become optimum low altitude flight training areas. Department of Defense (DOD) policy as stated in a circular from the Federal Aviation Administration (AC no 91-36A) specifically advises, "military aircraft may at times overfly areas managed by the Department of the Interior at altitudes lower than the recommended 2,000 foot minimum, but in compliance with the minimum safe altitudes prescribed in FAR 91-79. Such deviations will occur only when essential to the mission being conducted". Use of this airspace down to the minimum published altitude and at maximum ground speeds is essential in accomplishment of our tactical flight training mission and is in compliance with FAR 91-79 and DOD policy.

3. Therefore, the 124 Tactical Reconnaissance Group strongly objects to the proposed Wilderness Areas 19-2, 111-17 and 17-11 because of the conflict between the wilderness resource characteristic of solitude and our tactical flight training mission. We cannot subject our current airspace to possible reduction because of noise complaints generated by military aircraft performing their mission over conservationists and recreationalists located in the proposed Wilderness Areas.

140.1

Robert R. Corbell II
 ROBERT R. CORBELL II, Colonel, IDANG
 Group Commander

1 arch
 Cy to: AG State of Idaho



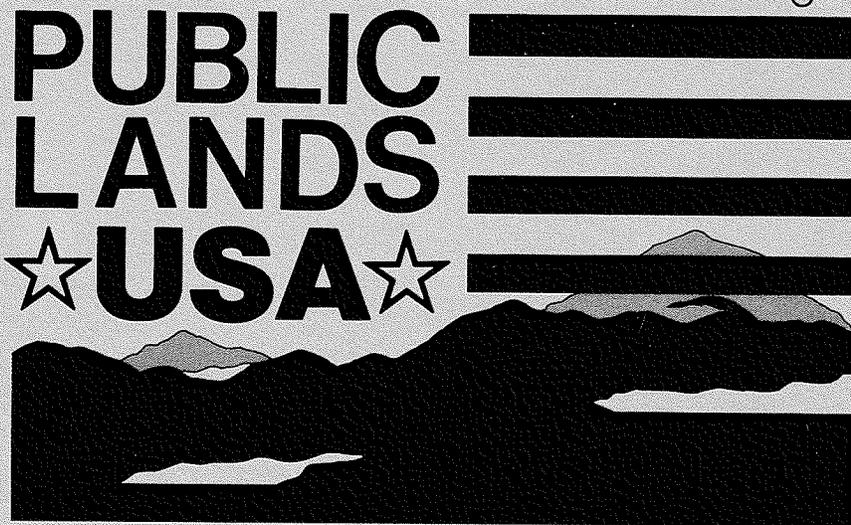
LIST OF PREPARERS

Name	Responsibility	Education	Experience
Mike Boltz	Range/Livestock	B.S. Wildlife Biology, M.S. Forest and Range Management - Washington State University	3 yr, Research Biol.-Washington State Univ 10 mo, Wildlife Biologist-SCS 7 yr, Range Conservationist-BLM
Gary Carson	Project Leader/Jarbidge Resource Area Manager	B.S. Range Science - Utah State University	12 yr, Range Conservationist-BLM 5 yr, Range Staff Specialist-BLM, ISO 1 yr, Range Program Leader-BLM, ISO 5 yr, Area Manager-BLM
James Clark	Wildlife - Terrestrial	B.S. Wildlife Management - University of Nevada	3 yr, Range Conservationist-BLM 8 yr, Wildlife Biologist-BLM
Fred Minckler	Team Leader	B.S. Fishery Management, B.S. Wildlife Management - Utah State University	1 yr, Recreation/Forestry Technician-BLM 1 yr, Soil Conservation Technician-SCS 4 yr, Fisheries Biologist-NMFS 2 yr, Fisheries Biologist-BLM 8 yr, Environmental Coordinator-BLM
Wally Meyer	Wilderness/Recreation Writer Editor	B.S. Forestry - Oregon State University	1 yr, Ranger-NPS 6 yr, Forester/Recreation-USFS 6 yr, Recreation Specialist-BOR 16 yr, Recreation Planner-BLM
Teresa Thomason	Word Processing	Oregon State University Kauai Community College Boise State University	8 yr, Editorial Assistant-BLM
Ted Weasma	Mineral & Energy Resources/Paleontologic Resources	B.S. Geology - University of Washington	2 yr, Civil Engineering Technician-USFS 1 yr, Cascade Testing Field Geologist 1 yr, Drill Inspector-USFS 6 yr, Geologist-BLM
Jack Young	Cultural Resources	B.A. Inter-American Studies - University of Texas-El Paso M.A. Anthropology - Catholic University of America	5 yr, Resource Inventory Team Archaeologist-BLM 5 yr, Jarbidge Resource Area Archaeologist-BLM

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Bureau of Land Management



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BOISE DISTRICT
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