

LEMHI RESOURCE AREA

EIGHTEENMILE WILDERNESS

FINAL

ENVIRONMENTAL

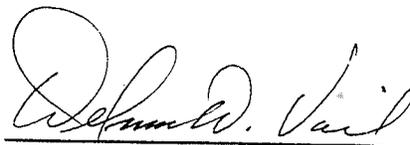
IMPACT STATEMENT



U.S. DEPARTMENT OF THE INTERIOR
BUREAU OF LAND MANAGEMENT
Salmon District, Idaho
September 1987



EIGHTEENMILE
WILDERNESS ENVIRONMENTAL IMPACT STATEMENT
FINAL

A handwritten signature in cursive script, reading "Delmar Vail", written in black ink. The signature is positioned above a horizontal line.

Delmar Vail
Idaho State Director

Prepared by
Department of the Interior
Bureau of Land Management
Idaho

Eighteenmile
Wilderness Environmental Impact Statement

Draft

Final Environmental Impact Statement

Type of Action:

Administrative

Legislative

Responsible Agencies:

1. Lead Agency: U.S. Department of the Interior, Bureau of Land Management
2. Cooperating Agencies: None

Abstract:

The Eighteenmile Wilderness Environmental Impact Statement analyzes the resource impacts which could result from designation or nondesignation of the Eighteenmile Wilderness Study Area (WSA) as wilderness. The WSA contains 24,922 acres of public land of which 14,796 acres are recommended for wilderness designation and 10,126 acres are recommended as nonsuitable for wilderness designation.

Comments have been requested and received from:

See page 38 for a list of those provided a copy of the draft RMP/EIS.

See page 42 for a list of comments received regarding wilderness.

Date Draft Statement Available to EPA and the Public:

October 1, 1985

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SUMMARY

This Environmental Impact Statement (EIS) analyzes the impacts resulting from designating or not designating as wilderness all or portions of the Eighteenmile Wilderness Study Area's (WSA) 24,922 acres. The proposed action recommends 14,796 acres for wilderness designation and 10,126 acres for nonwilderness uses. The proposed action in this Final EIS is the same as in the Draft EIS and is the result of land use recommendations made in the Lemhi Resource Management Plan (RMP).

The significant environmental issues developed in the scoping process and in the public review of the Draft EIS were: 1) impacts on wilderness values; 2) impacts on the development of energy and mineral resources; 3) impacts on primitive and semi-primitive nonmotorized recreational opportunities; 4) impacts on water quality; and 5) impacts on crucial elk winter range and elk numbers.

Livestock grazing, which is recognized by Congress as an acceptable activity within wilderness areas, would continue under existing plans. Subject to valid existing rights, present law would withdraw any designated wilderness from appropriation under the mining laws effective the date of designation.

Six alternatives were considered: All Wilderness, two No Wilderness alternatives (retention and development), two Partial Wilderness alternatives (retention and development) and No Action. The two No Wilderness alternatives differ in that the no wilderness/retention alternative favors maintaining most of the roadless area as such while the no wilderness/development alternative would allow road building and development to occur throughout the WSA. The partial wilderness alternatives have similar retention/development objectives with regards to the lands recommended for nonwilderness management. The No Action and No Wilderness/Development alternatives are combined because there is no measurable difference between the possible impacts of either.

CHAPTER 1

INTRODUCTION AND PLANNING PROCESS

Purpose and Need

The purpose of the proposed action is to manage and preserve the wilderness characteristics on 14,796 acres in the Eighteenmile Wilderness Study Area (WSA) and to manage 10,126 acres in the WSA for uses other than wilderness. This environmental impact statement (EIS) assesses the environmental consequences of managing the WSA as wilderness or nonwilderness, and of managing only a portion of the WSA as wilderness.

The Federal Land Policy and Management Act of 1976 mandates the Bureau of Land Management (BLM) to manage the public lands and their resources under the principles of multiple use and sustained yield. Wilderness values are identified as part of the spectrum of multiple land use values to be considered in BLM inventory, planning, and management. Section 603 of the Federal Land Policy and Management Act requires a wilderness review of BLM roadless areas of 5,000 or more acres and roadless islands.

The BLM inventory process identified wilderness study areas (WSAs) that had the mandatory wilderness characteristics (size, naturalness, and solitude and/or primitive recreation opportunities). Suitable or nonsuitable wilderness recommendations for each WSA will be presented to the President by the Secretary of the Interior. The President will then make recommendations to Congress. Areas can be designated as wilderness only by Congress. If designated as wilderness, an area would be managed in accordance with the Wilderness Act of 1964.

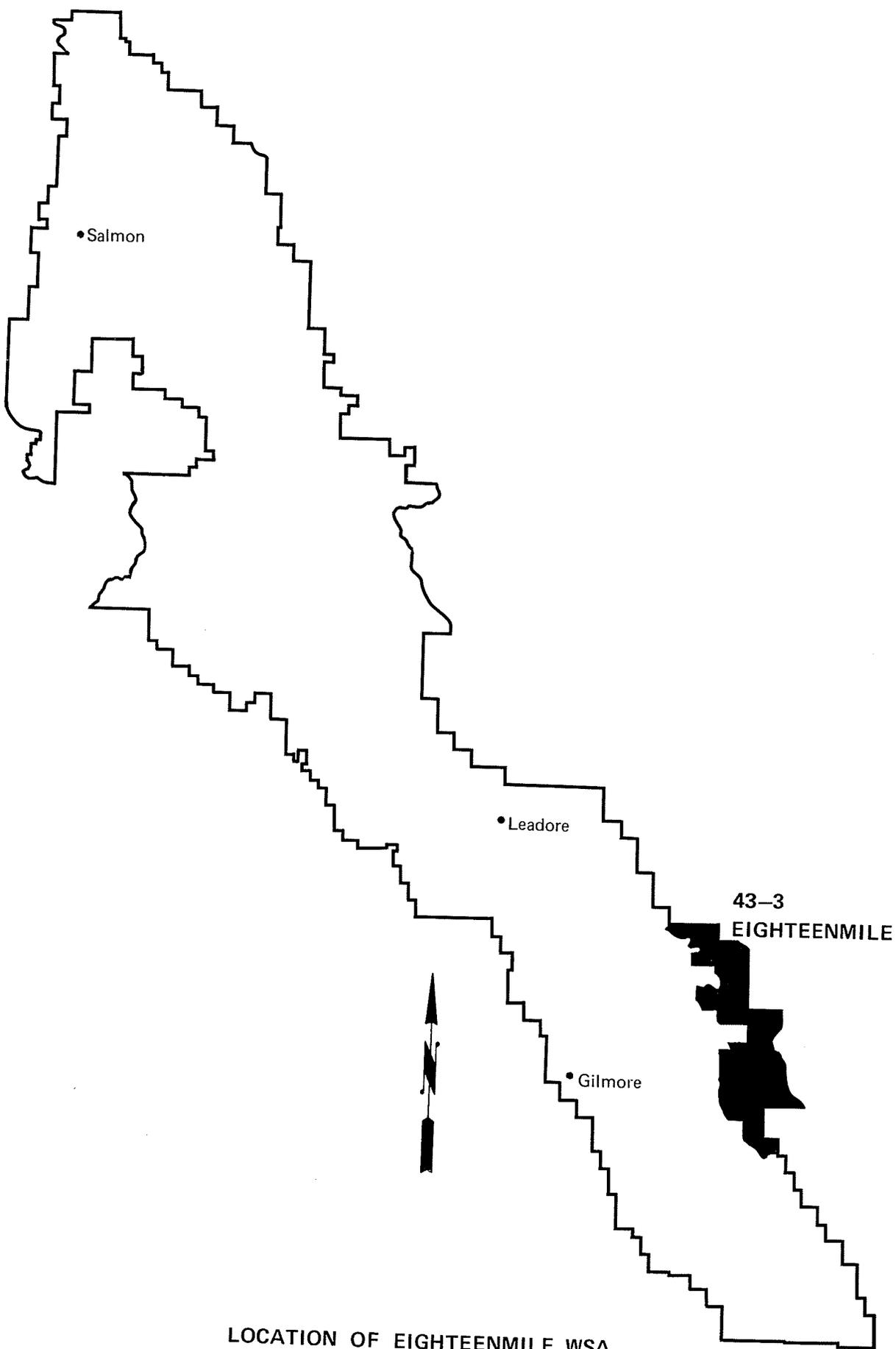
Location

The Eighteenmile WSA is located in east-central Idaho in the BLM's Lemhi Resource Area of the Salmon District. Maps 1 and 2 show the location of the WSA in relation to major features and population centers.

Environmental Issue Identification and Scoping

The scoping process for the Eighteenmile Wilderness EIS (conducted at the same time as the Lemhi Resource Management Plan (RMP)/EIS scoping process) resulted in issues being identified by the BLM staff, the public, the Salmon District Multiple Use Advisory Council, and the Salmon District Grazing Advisory Board and in issues being raised through individual contacts with the U.S. Forest Service and Soil Conservation Service. Scoping will continue during review of the draft RMP/EIS. BLM will review comments on the issues and alternatives analyzed and assess the need for analyzing new issues and alternatives raised during the comment period.

Throughout the scoping process, consultation will continue with the Idaho State Historic Preservation Officer concerning the presence or absence of sites in the WSA that would be eligible for nomination for listing on the "National Register of Historic Places". Consultation with the U.S. Fish and Wildlife Service concerning threatened and endangered species has already occurred.



LOCATION OF EIGHTEENMILE WSA

The environmental issues selected for analysis in this EIS are as follows:

1. Impacts on Wilderness Values - The wilderness values of naturalness, solitude, and primitive recreation could benefit from wilderness designation. The same values may be adversely affected by uses and actions that would occur should the WSA not be designated as wilderness. The significance of these beneficial or adverse impacts is an issue for analysis in the EIS.
2. Impacts on the Development of Energy and Mineral Resources - Wilderness designation would withdraw the designated lands from mineral entry. This would severely restrict exploration activities and preclude development of energy and mineral resources within the wilderness area. The effect of wilderness designation on the development of energy and mineral resources is an issue for analysis in the EIS.
3. Impacts on Primitive, Semi-Primitive Nonmotorized and Motorized Recreational Opportunities - Management of the WSA for uses other than wilderness could eliminate the areas currently rated as primitive and semi-primitive nonmotorized in character. The WSA includes all of the primitive lands in the Lemhi Resource Area. The effect of nonwilderness management on primitive and semi-primitive nonmotorized recreational opportunities is an issue for analysis in the EIS. Management of all or a portion of the WSA as wilderness would displace existing motorized use oriented activities.
4. Impacts on Water Quality - Development of known and highly probable mineral resources could adversely affect water quality in Tenmile and Clear creeks. On the other hand, water quality could benefit from wilderness designation and mineral withdrawals. The significance of these impacts is an issue for analysis in the EIS.
5. Impacts on Crucial Elk Winter Range and Elk Numbers - As a result of questions raised in several comment letters, BLM took a new look at the impact of projected mineral developments on elk and their crucial winter range in and near the WSA. It was felt that significant impacts were possible. A new issue statement and analysis were added to the Final EIS.

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

1. Impacts on Livestock Operations - Concerns were raised that livestock operators might have to modify their operations within designated wilderness, thus harming their business. This issue was considered but dropped because 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 WSA would be more closely regulated, they would continue as they did prior to wilderness designations, subject to reasonable regulations. The few proposed range improvements are small

in scale and similar to existing improvements. The wilderness management policy allows these types of improvements in order to continue the existing livestock program. While this issue has been dropped from analysis, a brief description of the planned livestock program has been included because this is a significant nonconforming use that is specifically allowed by Congress and that includes all lands in the WSA.

2. Impacts of Wilderness Designation on Reintroduction of Bighorn Sheep. The Idaho Department of Fish and Game has noted that bighorn sheep could be reintroduced in the WSA. The reintroduction of bighorn sheep, if it occurred, would not depend on wilderness designation. Since BLM's wilderness management policy provides guidelines for reintroduction of native wildlife species and the reintroduction is only speculative, this issue was dropped from analysis.
3. Impacts on Cultural Resources - Consultation with the Idaho State Historic Preservation Officer during scoping determined that there are no cultural sites within the WSA that are eligible for nomination for listing on the National Register of Historic Places. The archaeological sites that do exist in the area would be protected with or without wilderness designation. Since the management of cultural resources would not differ significantly with or without wilderness designation, the issue of impact to cultural resources was dropped from further analysis.
4. Impacts on Recreational Off-Road Vehicle Use - Wilderness designation would close the WSA to use by off-road vehicles (ORVs). The existing terrain naturally limits ORV use because of steep slopes and rocky terrain. The natural limits of the terrain should also eliminate the potential for expansion or increase in length of the few four-wheel drive ways in the WSA. Present ORV use is estimated to be less than 1 percent of the total ORV use in the Lemhi Resource Area (less than 25 visitor days per year). Based on the nearly negligible ORV use in the WSA, compared to virtually limitless similar opportunities within the remainder of the resource area, the issue of wilderness designation and its effect on ORV use was dropped from further consideration.
5. Impacts on Wildlife Species other than Elk - An issue dealing with wildlife species other than elk was considered but not included in this EIS. Based on projections of development in the WSA, little or no change in wildlife populations or habitat (other than elk) is anticipated with either wilderness designation or nondesignation. There are no wildlife habitat improvement projects planned in the WSA.
6. Impacts on Endangered Species - No endangered plant species have been identified. Consultation with the U.S. Fish and Wildlife Service identified the possible occurrence of the gray wolf in the area. Consultation will continue in the future as appropriate. Since the RMP/EIS has determined that a wilderness or nonwilderness decision would not affect deer populations (the wolf's prey base) and the

possibility of timber harvest is remote because of adverse economic conditions, no significant impacts to the gray wolf are anticipated (if, in fact, it does inhabit this area). This issue has therefore been dropped from further consideration.

7. Impacts on Forest Management - An issue dealing with the effect of wilderness designation on forest management was considered but not included in this EIS. Estimates made by BLM staff foresters indicate that each thousand board feet (MBF) would cost \$64 more to harvest than the price a logger could receive for it from a mill. This timber is expected to remain uneconomic to harvest for at least the next 20 years and possibly longer if the current balance between supply, demand, and cost structure remains constant. No timber sales are planned for this area in the foreseeable future, so forest management was dropped as an issue.
8. Forest Product Sales - Due to the remoteness of the WSA and the availability of fuelwoods, posts and poles and Christmas trees on Forest Service and BLM lands closer to population centers, no sales are projected now or in the foreseeable future.
9. Vegetation Manipulation - No vegetation manipulation projects have been proposed within the WSA.
10. Fire Management - Fire management was not analyzed as an issue because:
 - a. Fire occurrence is extremely low, 3 small fires in the last 32 years;
 - b. The unpredictable randomness of fire occurrence makes a site specific analysis of impacts impossible;
 - c. Restrictions imposed by current BLM fire guidance, the existing WSA Fire Management Plan and future roadless management (whether designated wilderness or not) would prevent the use of mechanized equipment (except for control of extreme fire situations); and
 - d. Should future range/wildlife management plans propose prescribed fires, they would only be allowed if there was a positive benefit to the vegetative, soil, water and wilderness resources/values.
11. Soils - Since no watershed in the WSA was identified in the Lemhi RMP as being in poor condition, no surface disturbing projects are proposed, livestock numbers are being reduced to enhance range/vegetative conditions and the above actions are common to all alternatives, no impact to soils is anticipated and soils was not analyzed as an issue.

The Planning Process and Selection of the Proposed Action

Development of the proposed action has been guided by requirements of the Bureau's Planning Regulations, 43 CFR 1600. 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 during the planning sequence in developing suitability recommendations.

The proposed action recommends wilderness designation for 14,796 acres with high quality wilderness values in the Eighteenmile WSA (Map 3). The proposed action also recommends nonwilderness designation for 10,126 acres of the WSA that have lower quality wilderness values and a moderate to high potential for mineral discovery and development.

Alternatives to the Proposed Action Selected for Analysis

A range of alternatives from resource protection to resource production was formulated and evaluated for the Eighteenmile WSA. The alternatives assessed in this EIS include (1) two no wilderness alternatives, (2) an all wilderness alternative, and (3) two partial wilderness alternatives, one of these being the proposed action. The two no wilderness alternatives differ in that one would allow roaded development of the WSA, while the other would maintain as roadless a portion of the WSA that offers primitive recreation opportunities.

In this document, the no action alternative, as required by the National Environmental Policy Act, and the no wilderness/development alternative are the same. The no action alternative represents a continuation of current land use plans. No long-range land use plans have ever been completed for the Gilmore Planning Unit, which includes the Eighteenmile WSA. Management to date has occurred on a case-by-case basis and was based on a long-term nonwilderness management strategy until the wilderness study process began.

The all wilderness alternative represents the maximum possible acreage that could be recommended for wilderness designation.

The two partial wilderness alternatives fall between the all wilderness and no wilderness alternatives. In this EIS, the two partial wilderness alternatives recommend the same area for wilderness but have significantly different recommendations for future management of the area recommended for nonwilderness.

Alternatives Considered But Dropped from Analysis

A partial alternative was suggested by the Salmon National Forest. They suggested utilizing a ridgeline south of Chamberlain Creek rather than the proposed action's use of a ridgeline north of the creek as the dividing line between the recommended wilderness and nonwilderness areas. This change would eliminate any problems between the users on the roadless lands not recommended for wilderness in the Salmon National Forest and the users of adjacent BLM lands recommended for wilderness.

This alternative was considered but dropped after additional field examinations determined that the Chamberlain Creek drainage should be included in the recommended wilderness area as set forth in the proposed action. The Forest Service lands involved are completely surrounded by BLM lands and are thus isolated from the rest of the national forest at the top of the Continental Divide. Management of these Forest Service lands would not be significantly affected by BLM's wilderness recommendations.

CHAPTER 2

ALTERNATIVES INCLUDING PROPOSED ACTION

Since the pattern of future actions within the WSAs cannot 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 environmental impact statement (EIS). They are not management plans or proposals but do represent feasible patterns of activities which could occur under the alternatives analyzed.

Proposed Action: Partial Wilderness/Development

A portion of the Eighteenmile WSA encompassing 14,796 acres would be recommended for wilderness designation (see Map 3). The remaining 10,126 acres located in the northern end of the WSA would not be recommended for wilderness designation. Lands not recommended would be open for multiple use management and development, which could include road construction and surface disturbance. This alternative is depicted in the Lemhi RMP/EIS as a part of Alternative F.

Livestock and Range Actions

The approved resource management plan (Lemhi RMP) has a goal of providing 2,388 AUMs for livestock use in the WSA. For the last 5 years an average of 2,733 AUMs have been used by livestock each year. (As many as 2,969 AUMs could have been used each year.) The planned reduction in AUMs will allow for better ecologic condition and improved plant vigor. Only 2,271 AUMs would be authorized until planned range improvements achieved their purposes. Projections beyond existing planning estimates (beyond the 15 to 20 year planning cycle) indicate it is reasonable to expect that 2,388 AUMs of use would be maintained in the future.

Four miles of fence, one mile of water pipeline, and seven developed springs would be maintained within the WSA (Map 4). New range improvements consisting of two miles of fencing, one mile of water pipeline, and three developed springs are planned. Projections beyond existing planning estimates indicate no change in maintenance activities and no additional construction of livestock and range management facilities.

Recreational Designations and Use Opportunities

Within the WSA, 10,126 acres would remain open to off-road vehicle (ORV) use, while 14,796 acres would be closed to ORV use. Recreational ORV use is projected to remain below 25 visitor days annually for the next 5 to 10 years. Projections beyond the existing planning cycle (beyond 15 to 20 years) indicate it is reasonable to expect that recreational ORV use would increase slightly but would remain below 50 visitor days annually. Four miles of road associated with mineral development in the northern end of the WSA are expected to be constructed in the future.

The entire WSA would be open for other recreation activities, including hunting, horseback riding (generally associated with hunting activities), camping (generally associated with hunting activities), photography, and sightseeing. Recreational use for these activities would remain below 100 visitor days for the next 10 years. Projections beyond existing planning estimates (beyond the 15 to 20 year planning cycle) indicate it is reasonable to expect that recreational use for these activities would increase slightly but would remain below 200 visitor days annually for the foreseeable future. Future recreational use would probably be oriented towards the designated wilderness area rather than the lands managed for nonwilderness uses.

No recreation facilities or developed trails exist in the WSA and none are planned. However, the four miles of road associated with mineral development would be used by hunters to gain access to the northern portion of the WSA. All of the WSA's lands offering primitive recreational opportunities (3,840 acres) and 69 percent of the lands offering semi-primitive nonmotorized opportunities (8,774 acres) would be included in the wilderness area (Map 5).

Energy and Mineral Resources Development Actions

It is assumed that phosphate mining would occur on 1,920 acres and involve two miles of road construction in the area between Tenmile Creek and Dry Canyon. Renewed mining of known gypsum deposits adjacent to the WSA in Clear Creek would expand into the WSA, involving 300 acres and one mile of road construction.

It is further assumed that two mining claims would be filed and explored between Dry Canyon and Horse Thief Creek, resulting in one mile of new road and 50 acres of surface disturbance. No oil and gas drilling activity is anticipated for the nondesignated area in the WSA because drilling on land immediately adjacent to the WSA would be less costly both in terms of access road construction and drilling costs.

The 14,796 acres recommended for wilderness would be withdrawn, subject to valid existing rights, from all forms of appropriation under the mining laws upon designation by Congress.

Timber Harvest/Forest Product Sales

No timber harvest or forest product sales are planned or projected.

Vegetation Manipulation/Wildlife Habitat Improvement

No projects planned or projected.

No Wilderness/Retention Alternative

None of the WSA would be designated as wilderness (Map 3). However, 12,614 acres would be managed to retain their existing roadless condition. All of these lands are located within the portion of the WSA

recommended for wilderness in the proposed action. The remaining 12,308 acres would be open for resource development. This alternative portrays the preferred management strategy for the WSA should Congress not accept the proposed action and designate the WSA for nonwilderness management. This alternative is depicted in the Lemhi RMP/EIS as a part of Alternative G.

Livestock and Range Actions

See the proposed action for a description of projected livestock and range actions.

Recreational Designations and Use Opportunities

Within the WSA, 12,308 acres would be designated as open to ORV use, while 12,614 acres would be closed. Recreational ORV use is projected to remain below 50 visitor days annually for the next 5 to 10 years. Projections beyond the existing planning cycle (beyond 15 to 20 years) indicate it is reasonable to expect that recreational ORV use would increase slightly but would remain below 100 visitor days annually. Four miles of road associated with mineral development in the northern end of the WSA are expected to be constructed in the future.

The entire WSA would be open for other recreation activities, including hunting with its associated horseback riding and camping, photography, and sightseeing. No recreation facilities or developed trails exist in the WSA and none are planned. However, the four miles of road associated with mineral development would be used by hunters to gain access to the northern portion of the WSA. Recreational use for these activities would remain below 50 visitor days for the next 10 years. Projections beyond the 15- to 20-year planning cycle indicate that recreational use for these activities would increase slightly but would remain below 150 visitor days annually for the foreseeable future. All of the WSA's lands inventoried as offering primitive recreational opportunities (3,840 acres) and sixty-nine percent of the lands offering semi-primitive non-motorized opportunities (8,774 acres) would be included in the area managed as roadless.

Energy and Mineral Resources Development Actions

No areas would be withdrawn from mineral entry, but the 12,614 acres of roadless lands would be managed under a "no-surface-occupancy" stipulation. Phosphate mining, renewed gypsum mining, and filing of mining claims would be as described for the proposed action.

Timber Harvest/Forest Product Sales

No timber harvest or forest product sales are planned or projected.

Vegetation Manipulation/Wildlife Habitat Improvement

No projects planned or projected.

No Wilderness/Development Alternative (No Action)

None of the WSA would be recommended for wilderness designation (Map 3). The entire WSA would be open to resource development. This alternative is depicted in the Lemhi RMP/EIS as a part of Alternatives A, D, and E.

Livestock and Range Actions

Actions would be the same as described for the proposed action.

Recreational Designations and Use Opportunities

All 24,922 acres in the WSA would be designated as open to ORV use. See the no wilderness/retention alternative for recreational ORV use projections. Four miles of road associated with mineral development in the northern end of the WSA are expected to be constructed in the future.

The entire WSA would be open for other recreation activities, including hunting, horseback riding, camping, photography, and sightseeing. Recreational use for these activities would remain below 50 visitor days for the next 10 years. Projections beyond the 15 to 20 year planning cycle indicate that recreational use for these activities would increase slightly but would remain below 100 visitor days annually for the foreseeable future. No recreation facilities or developed trails exist in the WSA and none are planned; however, four miles of road associated with mineral development would be used by hunters to gain access to the northern portion of the WSA.

No lands within the WSA would be managed for primitive or semi-primitive nonmotorized recreational opportunities.

Energy and Mineral Resources Development Actions

Projected minerals actions would be the same as described for the proposed action. No areas would be withdrawn or managed under a no-surface-occupancy stipulation.

Timber Harvest/Forest Product Sales

No timber harvest or forest product sales are planned or projected.

Vegetation Manipulation/Wildlife Habitat Improvement

No projects planned or projected.

All Wilderness Alternative

All 24,922 acres of the WSA would be recommended for wilderness designations (Map 3). This alternative is depicted in the Lemhi RMP/EIS as a part of Alternative C.

Livestock and Range Actions

See the proposed action for a description of projected livestock and range actions.

Recreational Designations and Use Opportunities

The area would be closed to all ORV use except that required for the maintenance of livestock facilities or operations. An estimated 25 visitor days of recreational ORV use presently occur in the area.

The entire WSA would be open for other recreation activities including hunting, horseback riding, camping, photography, and sightseeing. Recreational use for these activities would remain below 100 visitor days for the next 10 years. Projections beyond the 15 to 20 year planning cycle indicate that recreational use for these activities would increase slightly but would remain below 250 visitor days annually for the foreseeable future.

No recreation facilities or developed trails exist in the WSA and none are planned. All of the lands currently offering primitive or semi-primitive nonmotorized recreational opportunities would be managed to retain these settings.

Energy and Mineral Resources Development Actions

The lands in the WSA would be withdrawn, subject to valid existing rights, from all forms of appropriation under the mining laws.

Timber Harvest/Forest Product Sales

No timber harvest or forest product sales are planned or projected.

Vegetation Manipulation/Wildlife Habitat Improvement

No projects planned or projected.

Partial Wilderness/Retention Alternative

The same 14,796 acres recommended for wilderness designation under the proposed action would be recommended under this alternative (see Map 3). The remaining 10,126 acres located in the northern end of the WSA would not be recommended for wilderness designation. Of the 10,126 nonwilderness acres, 6,100 acres would be open for multiple use management and development, while the remaining 4,026 acres would be closed to vehicular use and managed to retain the existing semi-primitive nonmotorized recreational opportunity settings. This alternative is depicted in the Lemhi RMP/EIS as a part of Alternative B.

Livestock and Range Actions

Actions would be the same as described for the proposed action.

Recreational Designations and Use Opportunities

Within the WSA 6,100 acres would remain open to ORV use; 18,822 acres would be closed. See the proposed action for recreational ORV use projections. Three miles of road associated with mineral development in the northern end of the WSA are expected to be constructed in the future.

Recreation activities and use levels would be as described for the proposed action. Future recreational use would probably be oriented towards the designated wilderness area rather than the lands managed for nonwilderness uses.

No recreation facilities or developed trails exist in the WSA and none are planned. However, the three miles of road associated with mineral development would be used by hunters to gain access to the northern portion of the WSA.

All of the WSA's lands offering primitive or semi-primitive nonmotorized recreational opportunities would be retained in their existing condition through vehicle use closures and future development restrictions (see Minerals).

Energy and Mineral Resources Development Actions

It is assumed that phosphate mining would occur on 700 acres located outside of the semi-primitive nonmotorized area and would involve one mile of road construction between Tenmile Creek and Dry Canyon. Other mineral activities would be as described for the proposed action.

The 14,796 acres recommended for wilderness would be withdrawn, subject to valid existing rights, from all forms of appropriation under the mining laws upon designation by Congress.

Timber Harvest/Forest Product Sales

No timber harvest or forest product sales are planned or projected.

Vegetation Manipulation/Wildlife Habitat Improvement

No projects planned or projected.

TABLE 1
COMPARATIVE IMPACT SUMMARY

ENVIRONMENTAL ISSUE	PROPOSED ACTION: PARTIAL WILDERNESS/ DEVELOPMENT	NO WILDERNESS/RETENTION	NO WILDERNESS/ DEVELOPMENT	ALL WILDERNESS	PARTIAL WILDERNESS/ RETENTION
Wilderness Values - Naturalness - Solitude - Primitive or Unconfined Recreation	Naturalness & solitude would be adversely affected or lost on 2,470 acres (10% of WSA) due to the construction of 4 miles of new road & 2,270 acres of surface disturbance associated with projected mining development. Wilderness values on 7,656 acres (31%) would be subject to loss but no adverse activities are presently anticipated.	Naturalness & solitude would be adversely affected or lost on 2,470 acres (10% of WSA) due to the construction of 4 miles of new road & 2,270 acres of surface disturbance associated with projected mining development. Wilderness values on 22,452 acres (90%) would be subject to loss but no adverse activities are presently anticipated.	Naturalness & solitude would be adversely affected or lost on 2,470 acres (10% of WSA) due to the construction of 4 miles of new road & 2,270 acres of surface disturbance associated with projected mining development. Wilderness values on 22,452 acres (90%) would be subject to loss but no adverse activities are presently anticipated.	Impacts to solitude & naturalness would not occur on 2,470 acres of projected development. No road construction or surface disturbance.	Naturalness & solitude would be adversely affected or lost on 1,250 acres (5% of WSA) due to the construction of 4 miles of new road & 1,050 acres of surface disturbance associated with projected mining development. Wilderness values on 8,926 acres (36%) would be subject to loss but no adverse activities are presently anticipated.
Exploration for & Development of Energy & Mineral Resources	Loss of opportunity to develop any energy & mineral resources on 14,796 acres recommended for wilderness. Mining of both phosphate & gypsum is projected on the 2,470 acres within the area not recommended for wilderness.	Mining of both phosphate & gypsum is projected on 2,470 acres within the area not recommended for wilderness.	Mining of both phosphate & gypsum is projected on 2,470 acres within the area not recommended for wilderness.	Loss of opportunity to develop any energy & mineral resources on 2,470 acres.	Loss of opportunity to develop any energy & mineral resources on 14,796 acres recommended for wilderness. Mining of both phosphate & gypsum is projected on the 2,470 acres within the area not recommended for wilderness.
Primitive, Semi-Primitive Nonmotorized & Motorized Recreation Opportunities	Primitive and semi-primitive nonmotorized recreation opportunities would be lost on 4,026 acres due to the construction of roads and vehicle uses associated with projected mining activities. 15 visitor days of ORV use would be displaced.	Primitive and semi-primitive nonmotorized recreation opportunities would be lost on 4,026 acres due to the construction of roads and vehicle uses associated with projected mining activities. 15 visitor days of ORV use would be displaced.	In the long-term, all primitive & semi-primitive nonmotorized recreational opportunities would be lost because of gradual proliferation in four-wheel drive tracks & the influence of mining activities. No displacement of ORV use.	25 visitor days of ORV use displaced.	15 visitor days of ORV use would be displaced.
Water Quality	Loss of one mile of marginal fishery habitat. No impact on fisherman use days (none occur). Water quality could be adversely impacted in Tenmile Creek & Clear Creek by mining activity. Sediment levels could exceed Environmental Protection Agency (EPA) standards.	Loss of one mile of marginal fishery habitat. No impact on fisherman use days (none occur). Water quality could be adversely impacted in Tenmile Creek & Clear Creek, depending on the location of mining activity. Sediment levels could exceed EPA standards.	Loss of one mile of marginal fishery habitat. No impact on fisherman use days (none occur). Water quality could be adversely impacted in all perennial streams in the area. In those watersheds where mining occurred, sediment levels could exceed EPA standards.	There would be no adverse impacts to water quality, fishery habitat, or fisherman use days.	Loss of one mile of marginal fishery habitat. No impact on fisherman use days (none occur). Water quality could be adversely impacted depending on the location of mining activity, Tenmile Creek & Clear Creek could have sediment levels exceeding EPA standards.
Crucial Elk Winter Range and Elk Numbers	All 500 acres of crucial elk winter range would be lost; 50% reduction in herd size (120 animals).	All 500 acres of crucial elk winter range would be lost; 50% reduction in herd size (120 animals).	All 500 acres of crucial elk winter range would be lost; 50% reduction in herd size (120 animals).	Loss of 500 acres of habitat and 120 animals would not occur.	All 500 acres of crucial elk winter range would be lost; 50% reduction in herd size (120 animals).

CHAPTER 3

AFFECTED ENVIRONMENT

Wilderness Values

Naturalness - Eighteenmile Creek WSA is a 24,922-acre unit that stands on its own as a study area. The unit is dominated by 11,141-foot Eighteen-mile Peak. The general topography is mountainous, with low hills rising to the Continental Divide's rolling meadows and steep cliffs. Eight major creeks, several valleys, and numerous smaller gulches drain into Eighteenmile Creek to the west.

Vegetation varies from lowland sagebrush-grass communities up through Douglas fir, lodgepole pine, and limber pine to grassy meadows on the divide. Willow-aspen riparian vegetation occupies most creek bottoms. No vegetation manipulations or timber harvest other than some minor fence post and rail cutting has occurred.

Solitude - The WSA provides an outstanding opportunity for solitude due to rugged terrain, vegetative screening, remoteness and limited accessibility. Under ideal conditions of moderate (500 visitor use days per year) and evenly distributed use, opportunities would be of high quality.

With heavy use (more than 500 visitor use days per year), it would be more difficult to isolate oneself from the sights and sounds of others since the steep slopes tend to concentrate use along the creek bottoms. The area currently receives less than 100 visitor use days per year.

Primitive and Unconfined Recreation - The area offers excellent opportunities for backpacking, rockhounding, hunting, wildlife viewing, and cross-country skiing. Use is normally precluded between December and May because access roads are closed by snow.

Special Features - The Continental Divide forms the eastern boundary of the WSA. Congress has designated a Continental Divide National Scenic Trail, but it is doubtful that the actual trail location would be in the WSA since an existing trail system exists nearby in Montana.

Energy and Mineral Resources

All surface and subsurface mineral estates in the WSA are in federal ownership and are open to mineral entry. There are no mining claims in the WSA (The Phase I Geology, Energy, and Minerals (GEM) Resource Assessment of the Eighteenmile GRA, prepared by WGM, Inc., is incorrect on this point). Oil and gas leases cover all 24,922 acres (100 percent) of the WSA.

The following discussion is an excerpt from the GEM Phase I report.

Mineral and Energy Economics

"Although the region encompassing the Eighteen Mile GRA is sparsely populated, the existing transportation infrastructure is adequate; thus, given sufficient reserves, grade and reasonable metal and energy prices, development of any metallic mineral or hydrocarbon deposits should not be impeded."

"The rise in the price of silver in the late 1970s spurred considerable exploration interest. U.S. market demand has steadily increased as more industrial uses for silver are found (Rosta, 1982). Silver deposits formerly considered to be low grade are now economically attractive at present prices. Additionally, recoverable silver values in base metal ores, e.g., lead or copper, now make a substantial contribution to mine profits."

"Gypsum which has been mined in the Eighteen Mile GRA is used in two forms: calcined and uncalcined (Appleyard, 1975). About 70% of the gypsum produced in the United States is calcined and is used primarily to produce gypsum wall board (Pressler, 1981). About 70% of the uncalcined gypsum is used in Portland cement, and the remainder is used as a soil conditioner. Gypsum demand is tied to the construction industry which has been depressed in recent years (Lacke, 1982). The price of gypsum averaged \$8.53/ton in 1981 (Pressler, 1981)."

"Thorium is used in nuclear reactors, refractories, mantles for incandescent lights, magnesium alloys as a hardener, welding rods, and electronics (Kirk, 1981). A mineral sands operation in Florida is the only thorium producer in the United States. The remainder of U.S. thorium needs are imported or supplied from government stockpiles."

"With the increase in the price of imported oil in the past decades, the deregulation of domestic natural gas prices, and increasing government emphasis on energy self sufficiency, exploration and development of domestic oil and gas resources has proceeded at an accelerated pace. Natural gas reserves discovered in the late 1950s and 1960s in the Montana Disturbed belt were not developed because of a lack of market (Heany, 1961). However, under present conditions drilling is taking place with a goal of near-term production."

"The economic feasibility of geothermal resource development is determined by its distance to market and its temperature. Long-distance transportation of lower temperature geothermal energy is not feasible whereas for electrical grade resources long transportation distances are feasible. Based on present requirements for the use of hot fluids in electrical generating techniques, geothermal systems with temperatures of less than

150°C do not have significant potential for electrical exploration. However, geothermal resources with temperatures less than 150°C do have significant potential for low and intermediate temperature geothermal utilization for space heating, material processing, etc., if their minimum temperature exceeds 0°C. At the lower end of the spectrum, as the energy content of the resource becomes less, or the drilling depth necessary for exploitation becomes greater, there is a very ill-defined cutoff. For example, shallow ground water temperatures on the order of 10-20°C can be used for heat pump applications, and in some cases these are considered geothermal resources. However, in this evaluation, a lower temperature than approximately 40°C is considered uneconomic as a geothermal resource."

LAND CLASSIFICATION FOR GEM RESOURCES POTENTIAL

Explanation of Classification Scheme

"In the following section the land in the Eighteen Mile GRA is classified for geology, energy and mineral (GEM) resources potential. The classification scheme used is shown in Table 2. Use of this system is specified in the contract under which WGM prepared this report.

"The evaluation of resource potential and integration into the BLM classification scheme has been done using a combination of simple subjective and complex subjective approaches (Singer and Mosier, 1981) to regional resources assessment. The simple subjective approach involves the evaluation of resources based on the experience and knowledge of the individuals conducting the evaluations. The complex subjective method involves use of rules, i.e., geologic inference, based on expert opinion concerning the nature and importance of geologic relationship associated with mineral and energy deposits (Singer and Mosier, 1981).

"The GEM evaluation is the culmination of a series of tasks. The nature and order of the tasks was specified by the BLM, however they constitute the general approach by which most resource evaluations of this type are conducted. The sequence of work was: (1) data collections, (2) compilation, (3) evaluation, and (4) report preparation. Two days of field work were done in the Eighteen Mile GRA.

"Each WSA is classified for locatable, leasable, and saleable resources potential.

TABLE 2

BUREAU OF LAND MANAGEMENT GEM RESOURCES LAND CLASSIFICATION SYSTEM

<u>CLASSIFICATION SCHEME</u>	<u>LEVELS OF CONFIDENCE</u>
1. The geologic environment and the inferred geologic processes do not indicate favorability for accumulation of mineral resources.	A. The available data are either insufficient and/or cannot be considered as direct evidence to support or refute the possible existence of mineral resources.
2. The geologic environment and the inferred geologic processes indicate low favorability for accumulation of mineral resources.	B. The available data provide indirect evidence to support or refute the possible existence of mineral resources.
3. The geologic environment, the inferred geologic processes, and the reported mineral occurrences indicate moderate favorability for accumulation of mineral resources.	C. The available data provide direct evidence, but are quantitatively minimal to support or refute the possible existence of mineral resources.
4. The geological environment, the inferred geologic processes, the reported mineral occurrences, and the known mines or deposits indicate high favorability for accumulation of mineral resources.	D. The available data provide abundant direct and indirect evidence to support or refute the possible existence of mineral resources.

"Locatable minerals are those which are locatable under the General Mining Law of 1872, as amended, and the Placer Act of 1870, as amended. Minerals which are locatable under these acts include metals, ores of metals, non-metallic minerals such as asbestos, barite, zeolites, graphite, uncommon varieties of sand, gravel, building stone, limestone, dolomite, pumice, pumicite, clay magnesite, silica sand, etc. (Maley, 1983).

"Leasable resources include those which may be acquired under the Mineral Leasing Act of 1920 as amended by the Acts of 1927, 1953, 1970, and 1976. Materials covered under this Act include: asphalt, bitumen, borates of sodium and potassium, carbonates of sodium and potassium, coal, natural gas, nitrates of sodium and potassium, oil, oil shale, phosphate, silicates of sodium and potassium, sulfates of sodium and potassium, geothermal resources, etc. (Maley, 1983).

"Saleable resources include those which may be acquired under the materials Act of 1947 as amended by the Acts of 1955 and 1962. Included under this Act are common varieties of sand, gravel, stone, cinders, pumice, pumicite, clay, limestone, dolomite, peat and petrified wood (Maley, 1983).

CLASSIFICATION OF THE EIGHTEENMILE WILDERNESS STUDY AREA (43-3)

Locatable Resources

"Metallic Minerals. The portion of the Eighteen Mile Wilderness Study Area which is underlain by Paleozoic sedimentary rocks (1a, Map 6) is classified as having moderate potential for silver-lead-zinc deposits, similar to those in the Nicholia district, based on limited direct evidence (3C). The southern part of the WSA (2a, Map 6) is classified as having low potential for metallic minerals based on limited direct evidence (2C)."

"Uranium and Thorium. The portion of the Eighteenmile Wilderness Study Area which is underlain by the Beaverhead pluton (2b, Map 6) is classified as having moderate potential for thorium and low potential for uranium mineralization based on indirect evidence (3B). The remainder of the WSA (1b, Map 6) is classified as having moderate favorability for uranium based on indirect evidence (3B). The basis for this classification is the presence of the McGowan Creek formation in either the surface or subsurface within much of the area."

"Non-Metallic Minerals. The portion of the Eighteenmile Wilderness Study Area which is underlain by rocks of the Big Snowy Formation (2c, Map 6) is classified as having high favorability for gypsum based on limited direct evidence (4C). The remainder of the WSA (3c, Map 6) is classified as having low potential for non-metallic minerals based on limited direct evidence (2C)."

Leasable Resources

"Oil and Gas. All of the Eighteen Mile Wilderness Study Area (1a, Map 7) is classified as having moderate favorability for oil and gas resources based on limited direct evidence (3C). The basis of this classification is the favorable geologic environment coupled with the presence of favorable source rocks and structures."

"Geothermal. The portion of Eighteen Mile Wilderness Study Area (2b, Map 7) near the mouth of Eighteen Mile Creek is classified as having moderate potential for low temperature geothermal resources based on indirect evidence (3B). The remainder of the WSA (3b, Map 7) is classified as being unfavorable for low temperature geothermal resources based on indirect evidence (1B). All of the WSA (1b, Map 7) is classified as being unfavorable for high temperature geothermal resources based on indirect evidence (1B)."

"Sodium and Potassium. The Eighteen Mile Wilderness Study Area (1c, Map 7) is classified as having low favorability for sodium and potassium resources based on a limited direct evidence (2C). The basis of this classification is the absence of known occurrences of these minerals in the region and the unfavorable overall geologic environment."

"Other. All of the Eighteen Mile Wilderness Study Area (1d, Map 7) is classified as having low favorability for other leasable resources, including phosphate, bitumen, asphalt, and oil shale, based on limited direct evidence (2C). The basis of the classification is the absence of Phosphoria Formation within the WSA and the absence of known occurrences of other leasable resources in the region."

"Saleable Resources. The portion of the Eighteen Mile Wilderness Study Area which is underlain by Paleozoic carbonate rocks (1, Map 8) is classified as having high favorability for common varieties of limestone and dolomite based on indirect evidence (4B). The remainder of the WSA is classified as having low favorability for saleable resources based on limited direct evidence (2C)."

Recreation Resources. The WSA contains the only lands in the Lemhi Resource Area offering primitive or semi-primitive nonmotorized recreational opportunities. (See RMP Appendix F for a description of these opportunities.) Primitive opportunities occur on 3,840 acres and semi-primitive nonmotorized opportunities on 12,800 acres. The remaining 8,282 acres offer semi-primitive motorized recreational opportunities. These acres are also roadless but are within an influence zone of roads bordering the WSA.

Recreational off-road vehicle (ORV) use is estimated to be 25 visitor days annually (estimate by BLM staff). Steep terrain and heavy brush limit ORV use on the slopes and ridgelines that occupy 80 percent of the WSA. Most recreational ORV use occurs along drainage bottoms, primarily along Eighteenmile and Chamberlain creeks, where rough four-wheel-drive tracks exist.

Other dispersed recreational uses, such as hiking, sightseeing, hunting, and camping, occur at a very low level (less than 50 visitor use days per year) throughout the WSA. These uses are confined primarily to the drainage bottoms.

Water Quality. Good water quality (Idaho Department of Health and Welfare standards) characterizes all perennial stream reaches within the WSA. Adverse impacts on water quality at present are the result of livestock use, which increases nonpoint sedimentation and coliform bacteria. These impacts are localized and are presently at acceptable levels.

Fishery Habitat/Fisherman Use. Eighteenmile, Clear and Tenmile Creeks provide fishery habitat (4 miles) within the WSA. Eighteenmile Creek is in good to excellent ecologic condition and probably provides some fisherman use days as a secondary activity to individuals visiting the WSA for other reasons (i.e., hunting, livestock management). The headwaters of Clear and Tenmile Creeks within the WSA may provide marginal habitat for a small native fish population. Both of these creeks quickly leave the WSA and are then dewatered by irrigation diversions and provide little or no fishery habitat. No fisherman use of these two creeks is known (refer to Draft Lemhi RMP, pg. 3-17, Fisheries Habitat).

Wildlife. Wildlife diversity in the WSA mirrors that of the Lemhi Resource Area as a whole. Mule deer, elk, bear, sagegrouse and occasionally antelope and moose utilize the area. Much of the WSA is inaccessible in winter (refer to the Draft Lemhi RMP, pg. 3-13, Terrestrial Wildlife).

Five hundred acres in the northwestern tip of the WSA are included in a larger area of about 2,500 acres which is rated as crucial elk winter habitat (Map 4). General elk winter habitat extends north and south of the crucial area along the edge of the foothills. Approximately 240 head of elk winter in this area.

Forest Resources. The WSA contains 2,283 acres of commercial forest land (7.5% of CFL in planning area) and 6,187 acres of woodland (23.5% of woodlands in planning area). The remoteness of the area, distance to mills, road and other costs associated with timber sales and available resources in other areas combine to make timber harvest or forest product sales in this area unlikely in the next twenty years, if ever.

Adjacent Lands. The WSA is contiguous with a large block of Forest Service land in both Idaho (Salmon and Targhee National Forest) and Montana (Beaverhead National Forest)(Map 3). All of the adjacent Forest Service lands are currently under study as potential wilderness areas.

CHAPTER 4

ENVIRONMENTAL CONSEQUENCES

Proposed Action: Partial Wilderness/Development Alternative

The primary impact-producing factor for lands not recommended for wilderness would be the development of mineral resources and the effect of this activity on wilderness values over a long period of time. The primary impact-producing factors for lands recommended for wilderness would be wilderness designation and the subsequent mineral withdrawal.

Impacts on Wilderness Values

Non-Suitable Area: None of the wilderness values (naturalness, solitude and primitive or unconfined recreation) on 10,126 acres would receive the special legislative protection provided by wilderness designation. The short-term impact of this action would be negligible since little development activity is anticipated for the next five years. However, in the long term, the wilderness values of naturalness and solitude are expected to suffer adverse impacts or be lost because of mineral exploration and development. Prospecting for phosphate is expected to occur on 1,920 acres. Development of a mine is anticipated if an economically feasible discovery is made; known deposits occur just north of the WSA. Two miles of road construction would probably be associated with the phosphate area. The wilderness value of naturalness would be lost on the 1,920 acres. The perception of naturalness would be essentially lost over an additional 200-acre area because the area of phosphate prospecting could be seen.

Renewed mining of gypsum in Clear Creek would impact the perception of naturalness on 300 acres adjacent to the mine. One mile of road construction is anticipated.

For the purpose of this analysis, it is assumed that two discoveries and lode claims would be made between Dry Canyon and Horse Thief Creek. Based on similar developments in the area, construction of one mile of road and surface disturbance on 50 acres is expected.

The wilderness value of naturalness would be adversely impacted on a total of 2,470 acres.

Activities associated with mineral development would also adversely impact the wilderness value of solitude. Sights and sounds from traffic and construction related to mineral development would lower the quality of solitude on these 2,470 acres.

Sights and sounds from recreational off-road vehicle (ORV) use could also have an adverse impact on solitude. However, this impact is expected to be negligible compared to mining activities since ORV use is estimated to be less than 25 visitor days annually (estimate by BLM personnel) and is expected to remain below 50 visitor days annually for the next 15 to 20 years.

Suitable Area: Wilderness values on 14,796 acres would be protected by legislative mandate. Wilderness designation would withdraw these lands from mineral entry and eliminate the potential for future mineral development. The wilderness values of naturalness and solitude would benefit from this action.

Conclusion: Naturalness and solitude would be adversely affected on 10 percent (2,470 acres) and retained on 59 percent (14,796 acres) of the WSA. Wilderness values on 31 percent of the WSA (7,656 acres) would be subject to loss, but no adverse activities are presently anticipated.

Impacts on the Development of Energy and Mineral Resources

Non-Suitable Area: The nonwilderness 10,126 acres would remain open to mineral leasing and appropriation of minerals under the general mining laws. Development of potential mineral resources would be possible on the 2,470 acres projected for development. Mining of both phosphate and gypsum is projected.

Suitable Area: Wilderness designation would withdraw 14,796 acres from all forms of mineral entry, subject to valid existing rights.

Conclusion: Surface disturbance would occur on 2,470 acres within the non-suitable area. The 10,126 acres recommended non-suitable have the greatest potential for mineral resources discoveries and would remain open for exploration and development. Mineral potential of the 14,796 acres, which would be withdrawn from mineral entry, is low, based on available data and the geologic environment.

Impacts on Primitive, Semi-Primitive Nonmotorized and Motorized Recreational Opportunities

Non-Suitable Area: The 31 percent (4,026 acres) of the lands offering semi-primitive nonmotorized opportunities which are located in the suitable area would be lost because of the presence of roads associated with mining activities (see Recreation Opportunity Spectrum Class Descriptions - RMP Appendix F).

Suitable Area: Seventy-six percent (12,614 acres) of the lands offering primitive or semi-primitive nonmotorized recreational opportunities would be included in the proposed wilderness portion. This includes all of the primitive area and 69 percent (8,774 acres) of the semi-primitive nonmotorized area. Wilderness designations would maintain the character of these lands by prohibiting the use of vehicles. Consequently no impacts to these resource values is expected to occur.

An estimated 15 visitor days annually of ORV use would be eliminated from the proposed wilderness portion of the WSA. It is anticipated that all of this use would move to the nonwilderness portion of the WSA. Although encounters between ORV users and other recreationists are infrequent with current levels of use, the elimination of ORV use would benefit the wilderness value of solitude because visitors would not encounter or hear ORV

users in the area. Beneficial effects to naturalness from elimination of ORV use would be negligible since the level of use is already quite low.

Conclusion: Seventy-six percent (12,614 acres) of the lands offering primitive or semi-primitive nonmotorized recreational opportunities would continue to do so in the proposed suitable area. Opportunities would be lost on 24 percent (4,026 acres) of these lands because of anticipated mining activity in the proposed non-suitable area. Fifteen visitor days of ORV use would be displaced.

Impacts on Water Quality

Non-Suitable Area: Depending on the type, location, and extent of mining activity, water quality in areas not protected by wilderness designation could be adversely impacted. Tenmile Creek and Clear Creek would be the streams affected. All water quality standards set forth by state and federal regulations will be complied with. But, accidents could lead to noncompliance with water quality standards.

Maximum sediment levels of 80 to 400 milligrams per liter set by the Environmental Protection Agency (EPA) and the state of Idaho could be exceeded. It is unlikely that these creeks could support a fresh water fishery.

Due to topography and the probable location of mining activities on the lower edge of the WSA area, impacts to water quality would occur offsite (i.e., downstream from) rather than within the WSA. Since Clear and Tenmile Creeks are marginal fisheries at best due to dewatering, the loss of fishery habitat is limited to approximately one mile of stream above diversion points. No fisherman use is known to occur on these two creeks.

Suitable Area: No actions are projected. No impacts to water quality would occur.

Conclusion: Water quality could be adversely impacted in Tenmile and Clear creeks. Sediment levels would exceed standards set by EPA. Loss of one mile of marginal fishery habitat. No impact on fisherman use days (none known to occur). No impacts in the proposed suitable area.

Impacts on Crucial Elk Winter Range and Elk Numbers

Non-Suitable Area: The five hundred acres of crucial elk winter range would be lost due to projected mineral development on 2,470 acres. The general winter range would be split into two discontinuous halves. Elk numbers would decline by 50% resulting in a loss of 120 animals.

Suitable Area: No crucial winter range involved. No impacts.

Conclusion: All 500 acres of crucial elk winter range would be lost and a 50% herd decline (120 animals) would occur.

No Wilderness/Retention Alternative

The primary impact-producing factor would be the development of mineral resources and the effect of this activity on wilderness values over a long period of time.

Impacts on Wilderness Values

None of the wilderness values (naturalness, solitude and primitive or unconfined recreation) on 24,922 acres would receive the special legislative protection provided by wilderness designation. The short-term impact of this action would be negligible since little development activity is anticipated for the next five years.

In the long term, the wilderness values of naturalness and solitude are expected to suffer adverse impacts or be lost because of mineral exploration and development. This alternative's management of 12,614 acres as roadless would help to retain wilderness values on a portion of the area. This acreage would be open to mineral exploration, but operating plans and special stipulations regarding road construction, siting, and rehabilitation would be written to minimize the impacts of mineral activity. No mineral activity is anticipated on these 12,614 acres.

Impacts from phosphate and gypsum mining; development of lode claims, roads, mineral-related traffic and construction, would adversely impact naturalness and solitude on 2,470 acres as described in the proposed action wilderness values analysis on page 23.

Conclusion: Naturalness and solitude would be adversely affected on 10 percent (2,470 acres) of the WSA due to mineral exploration and development. Wilderness values on the other 90 percent (22,452 acres) of the WSA would be subject to loss, but no adverse activities are anticipated in the next twenty years.

Impacts on the Development of Energy and Mineral Resources

Development of potential mineral resources would be possible on the 2,470 acres projected for development. Mining of both phosphate and gypsum is projected.

All lands within the WSA would remain open for mineral leasing and for appropriation of minerals under the general mining laws. There would be no potential development of mineral resources foregone under this alternative; 12,614 acres would be subject to special stipulations due to roadless management.

Conclusion: Development of potential mineral resources would be possible on the 2,470 acres projected for development. Mining of both phosphate and gypsum is projected.

Impacts on Primitive, Semi-Primitive
Nonmotorized and Motorized Recreational Opportunities

Seventy-six percent (12,614 acres) of the lands offering primitive or semi-primitive recreational opportunities would retain these opportunities through roadless management. These lands would be closed to recreational ORV use, but this would create no impacts since no ORV use occurs on these lands. No existing ORV use would be displaced.

While closed to recreational ORV use, these lands would remain open to mineral exploration and development with special stipulations regarding access road construction, etc. This is not expected to have any short-term impact since mineral potential for this area was rated as low (GEM study) and no mineral activities are anticipated. The potential for long-term impacts would be greater as mineral activity moved from the more accessible areas to remote locations in search of new discoveries. Limited mineral exploration activities could be designed to be compatible with these recreational opportunities, but any substantial development would cause their loss.

The opportunity for non-motorized recreational activities on the remaining 24 percent (4,026 acres) of the WSA offering non-motorized opportunities would be lost because of the presence of roads associated with mining activities (see Recreation Opportunity Spectrum Class Descriptions - RMP Appendix F).

Conclusion: Seventy-six percent (12,614 acres) of the lands offering primitive or semi-primitive nonmotorized recreational opportunities would continue to do so because of a roadless nonwilderness management objective. Opportunities would be lost on 24 percent (4,026 acres) of these lands because of projected mining activity. Long-term loss of all opportunities is possible if mineral development occurred. No displacement of existing ORV use would occur.

Impacts on Water Quality

Depending on the type, location, and extent of mining activity, water quality in areas not protected by wilderness designation could be adversely impacted. Tenmile Creek and Clear Creek would be the streams affected. All water quality standards set forth by state and federal regulations will be complied with. But, accidents could lead to non-compliance with water quality standards.

Maximum sediment levels of 80 to 400 milligrams per liter set by the Environmental Protection Agency (EPA) and the state of Idaho could be exceeded. It is unlikely that these creeks could support a fresh water fishery.

Due to topography and the probable location of mining activities on the lower edge of the WSA area, impacts to water quality would occur offsite (i.e., downstream from) rather than within the WSA. Since Clear and Ten-mile Creeks are marginal fisheries at best due to dewatering, the loss of fishery habitat is limited to approximately one mile of stream above diversion points. No fisherman use is known to occur on these two creeks.

Conclusion: Water quality could be adversely impacted in Tenmile and Clear creeks. Sediment levels would exceed standards set by EPA. Loss of one mile of marginal fishery habitat. No impact on fisherman use days (none known to occur).

Impacts on Crucial Elk Winter Range and Elk Numbers

The five hundred acres of crucial elk winter range would be lost due to projected mineral development on 2,470 acres. The general winter range would be split into two discontinuous halves. Elk numbers would decline by 50% resulting in a loss of 120 animals.

Conclusion: All 500 acres of crucial elk winter range would be lost and a 50% herd decline (120 animals) would occur.

No Wilderness/Development Alternative (No Action)

The primary impact-producing factor for the lands not recommended for wilderness would be the development of mineral resources and the effect of this activity on wilderness values over a long period of time.

Impacts on Wilderness Values

None of the wilderness values (naturalness, solitude and primitive or unconfined recreation) on 24,922 acres would receive the special legislative protection provided by wilderness designation. The short-term impact of this action would be negligible since little development activity is anticipated for the next five years.

Impacts from phosphate and gypsum mining; development of lode claims, roads, mineral-related traffic and construction, would adversely impact naturalness and solitude on 2,470 acres as described in the proposed action wilderness values analysis on page 23.

Conclusion: Naturalness and solitude would be adversely affected on 10 percent (2,470 acres) of the WSA due to mineral exploration and development. Wilderness values on the other 90 percent (22,452 acres) of the WSA would be subject to loss, but no adverse activities are anticipated in the next twenty years.

Impacts on the Development of Energy and Mineral Resources

All lands within the WSA would remain open for mineral leasing and for appropriation of minerals under the general mining laws. There would be no potential development of mineral resources foregone under this alternative. Development of potential mineral resources would be possible on the 2,470 acres projected for development. Mining of both phosphate and gypsum is projected.

Conclusion: Development of potential mineral resources would not be foregone; 2,470 acres of surface disturbance.

Impacts on Primitive, Semi-Primitive Nonmotorized and Motorized Recreational Opportunities

No attempt would be made to retain the primitive or semi-primitive non-motorized opportunities which exist in the WSA. All 24,922 acres would be open to ORV use. This is not expected to produce any significant impacts since most of the area would remain impassable to ORVs. The level of use is expected to remain below 50 visitor days annually in the future.

Short-term impacts would be negligible since little change in existing use patterns is anticipated in the next five years. In the long term, the gradual extension of four-wheel drive tracks into the WSA and anticipated mining activities would change the roadless nature of the WSA to such an extreme that no lands would meet the criteria for primitive or semi-primitive nonmotorized opportunity management.

Conclusion: In the long term, all primitive and semi-primitive non-motorized recreational opportunities would be lost because of a gradual proliferation of four-wheel drive tracks and the influence of mining activities.

Impacts on Water Quality

Depending on the type, location, and extent of mining activity, water quality in areas not protected by wilderness designation could be adversely impacted. Tenmile Creek and Clear Creek would be the streams affected. All water quality standards set forth by state and federal regulations will be complied with. But, accidents could lead to non-compliance with water quality standards.

Maximum sediment levels of 80 to 400 milligrams per liter set by the Environmental Protection Agency (EPA) and the state of Idaho could be exceeded. It is unlikely that these creeks could support a fresh water fishery.

Due to topography and the probable location of mining activities on the lower edge of the WSA area, impacts to water quality would occur offsite (i.e., downstream from) rather than within the WSA. Since Clear and Tenmile Creeks are marginal fisheries at best due to dewatering, the loss of fishery habitat is limited to approximately one mile of stream above diversion points. No fisherman use is known to occur on these two creeks.

Conclusion: Water quality could be adversely impacted in Tenmile and Clear creeks. Sediment levels would exceed standards set by EPA. Loss of one mile of marginal fishery habitat. No impact on fisherman use days (none known to occur).

Impacts on Crucial Elk Winter Range and Elk Numbers

The five hundred acres of crucial elk winter range would be lost due to projected mineral development on 2,470 acres. The general winter range would be split into two discontinuous halves. Elk numbers would decline by 50% resulting in a loss of 120 animals.

Conclusion: All 500 acres of crucial elk winter range would be lost and a 50% herd decline (120 animals) would occur.

All Wilderness Alternative

The primary impact-producing factors would be the designation of wilderness, the subsequent withdrawal from mineral entry, and the effect of this withdrawal on mineral development.

Impacts on Wilderness Values

All 24,922 acres of the WSA would be designated wilderness. All wilderness values would be protected by legislative mandate. Wilderness values of naturalness and solitude would benefit from this action because approximately 2,470 acres of the WSA would not be impacted by mineral development activities.

Conclusion: Wilderness values would be maintained on all 24,922 acres of the WSA. Since development of potential mineral resources would be foregone, impacts to naturalness and solitude would not occur on 2,470 acres that would otherwise be disturbed.

Impacts on the Development of Energy and Mineral Resources

The opportunity to develop any energy and mineral resources on 2,470 acres which are projected suitable for development would be lost. Wilderness designation would withdraw all 24,922 acres of public land from all forms of mineral entry, subject to valid existing rights at the time of designation. No mining claims currently exist in the WSA.

Conclusion: The opportunity to develop any energy and mineral resources on 2,470 acres which are projected suitable for development would be lost.

Impacts on Primitive, Semi-Primitive Nonmotorized and Motorized Recreational Opportunities

Wilderness designation would ensure that existing primitive and semi-primitive nonmotorized recreational opportunities remained intact through the prohibition of vehicular use, road construction, or any other use which would alter the existing naturalness and roadless character of the

WSA. Within the wilderness, 3,840 acres would offer primitive opportunities and 12,800 acres would offer semi-primitive nonmotorized opportunities. The remaining 8,282 acres in the WSA would be closed to vehicular use but would remain classified as semi-primitive motorized because of the influence of nearby roads.

An estimated 25 visitor days annually of ORV use would be eliminated from the WSA by wilderness designation. Although encounters between ORV users and others are infrequent with current levels of use, the elimination of ORV use would benefit the wilderness value of solitude because visitors would not encounter or hear ORV users in the area. However, beneficial effects to naturalness resulting from the elimination of ORV use would be negligible since the level of use is already quite low.

Conclusion: All primitive (3,840 acres) and semi-primitive nonmotorized (12,800 acres) recreational opportunities would be retained. Twenty-five visitor days of ORV use would be displaced.

Impacts on Water Quality

The localized non-point sources of sediment and coliform bacteria associated with livestock use would remain unchanged, but this would not be a significant impact. Beneficial impacts to water quality from the elimination of ORV use would be negligible since the level of use would have been quite low (25 to 100 visitor days annually). Withdrawing the WSA from mineral entry would protect water quality in Tenmile and Clear creeks. The loss of one mile of marginal fishery habitat would be avoided.

Conclusion: There would be no adverse impacts to water quality.

Impacts on Crucial Elk Winter Range and Elk Numbers

Since no energy and mineral development would occur, no loss of elk habitat or number would occur.

Conclusion: Loss of 500 acres of habitat and 120 animals would not occur.

Partial Wilderness/Retention Alternative

The primary impact-producing factor for the lands not recommended for wilderness would be the development of mineral resources and the effect of these activities on wilderness values over a long period of time. For the lands recommended for wilderness, the primary impact-producing factors would be wilderness designation and the subsequent mineral withdrawal.

The primary difference between this alternative and the proposed action is that 4,026 of the 10,126 proposed non-suitable acres would be managed as roadless. Other differences from the proposed action are a reduced acreage for phosphate mining and the preservation of semi-primitive non-motorized recreational opportunities.

Impacts on Wilderness Values

Non-Suitable Area: None of the wilderness values on 10,126 acres would receive special legislative protection provided by wilderness designation. The short-term impact of this action would be negligible since little development activity is anticipated for the next five years. However, in the long term, the wilderness values of naturalness and solitude are expected to suffer adverse impacts or be lost because of mineral exploration and development. Management of 4,026 acres as roadless would help to retain wilderness values on a portion of the area. This acreage would be open to mineral exploration, but operating plans and special stipulations regarding road construction, siting, and rehabilitation would be written to minimize the impacts of mineral activity.

Prospecting for phosphate is expected to occur on 700 acres, with development of a mine being likely if an economically feasible discovery was made. Known deposits occur just north of the WSA. Two miles of road construction would probably be associated with the phosphate area. The wilderness value of naturalness would be lost on the 700 acres. The perception of naturalness would be impacted and essentially lost over an additional 200-acre area because the area of phosphate prospecting could be seen.

Renewed mining of gypsum in Clear Creek would impact naturalness on 300 acres adjacent to the mine. One mile of road construction is anticipated.

For the purpose of this analysis, it is assumed that two discoveries and lode claims would be made between Dry Canyon and Horse Thief Creek. Based on similar developments in the area, construction of one mile of road and surface disturbance on 50 acres is expected.

The wilderness value of naturalness would be adversely impacted on a total of 1,250 acres.

Activities associated with mineral development would also adversely impact the wilderness value of solitude. Sights and sounds from traffic and construction related to mineral development would lower the quality of solitude on the same 1,250 acres as discussed above.

Suitable Area: Wilderness values on 14,796 acres would be protected by legislative mandate. Wilderness designation would withdraw these lands from mineral entry and eliminate the potential for future mineral development. The wilderness values of naturalness and solitude would benefit from this action.

Conclusion: Naturalness and solitude would be adversely affected on 5 percent (1,250 acres) and retained on 59 percent (14,796 acres) of the WSA. Wilderness values on 36 percent of the WSA (8,926 acres) would be subject to loss, but no adverse activities are anticipated in the next twenty years.

Impacts on the Development of Energy and Mineral Resources

Non-Suitable Area: The nonwilderness 10,126 acres would remain open to mineral leasing and appropriation of minerals under the general mining laws. Development of potential mineral resources would be possible on the 1,050 acres projected for development. Mining of both phosphate and gypsum is projected.

Of the 10,126 proposed nonwilderness acres, 4,026 acres would be managed as roadless and while open to mineral entry would have special stipulations.

Suitable Area: Wilderness designation would withdraw 14,796 acres from all forms of mineral entry, subject to valid existing rights.

Conclusion: Surface disturbance would occur on 1,050 acres within the non-suitable area. The 10,126 acres recommended for nonwilderness have the greatest potential for mineral resources discoveries and would remain open for exploration and development. Mineral potential of the 14,796 acres, which would be withdrawn from mineral entry, is low, based on available data and the geologic environment.

Impacts on Primitive, Semi-Primitive Nonmotorized and Motorized Recreational Opportunities

All of the lands offering primitive or semi-primitive nonmotorized recreational opportunities would receive special management emphasis (either as designated wilderness or through roadless recreation management).

Non-Suitable Area: The semi-primitive nonmotorized opportunities located in the nonwilderness area, 31 percent (4,026 acres) of the WSA, would be retained through recreation management of the 4,026 acres as roadless. While closed to recreational ORV use, these lands would be open to mineral exploration and development with special stipulations for access, road location, etc. This is not expected to have any short-term impact, but the potential for long-term impacts would be greater as mineral activity moved from the more accessible areas to remote locations in search of new discoveries.

Suitable Area: Seventy-six percent (12,614 acres) of the lands offering primitive or semi-primitive nonmotorized recreational opportunities would be included in the proposed wilderness portion. This includes all of the primitive area and 69 percent (8,774 acres) of the semi-primitive nonmotorized area. Wilderness designation would retain the character of these lands by prohibiting the use of vehicles. Consequently, no impact to these resource values is expected to occur.

An estimated 15 visitor days annually of ORV use would be eliminated from the proposed wilderness portion of the WSA. It is anticipated that all of this use would move to the nonwilderness portion of the WSA. Although encounters between ORV users and other recreationists are infrequent with

current levels of use, the elimination of ORV use would benefit the wilderness value of solitude because visitors would not encounter or hear ORV users in the area. Beneficial effects to naturalness from elimination of ORV use would be negligible since the level of use is already quite low.

Conclusion: All lands offering primitive or semi-primitive nonmotorized recreational opportunities would receive special management. Wilderness designation would include 12,614 acres, while 4,026 acres would be managed as roadless. Fifteen days of existing ORV use would be displaced.

Impacts on Water Quality

Non-Suitable Area: Depending on the type, location, and extent of mining activity, water quality in areas not protected by wilderness designation could be adversely impacted. Tenmile Creek and Clear Creek would be the streams affected. All water quality standards set forth by state and federal regulations will be complied with. But, accidents could lead to noncompliance with water quality standards.

Maximum sediment levels of 80 to 400 milligrams per liter set by the Environmental Protection Agency (EPA) and the state of Idaho could be exceeded. It is unlikely that these creeks could support a fresh water fishery.

Due to topography and the probable location of mining activities on the lower edge of the WSA area, impacts to water quality would occur offsite (i.e., downstream from) rather than within the WSA. Since Clear and Tenmile Creeks are marginal fisheries at best due to dewatering, the loss of fishery habitat is limited to approximately one mile of stream above diversion points. No fisherman use is known to occur on these two creeks.

Suitable Area: No actions are projected. No impacts to water quality would occur.

Conclusion: Water quality could be adversely impacted in Tenmile and Clear creeks. Sediment levels would exceed standards set by EPA. Loss of one mile of marginal fishery habitat. No impact on fisherman use days (none known to occur). No impacts in the proposed suitable area.

Impacts on Crucial Elk Winter Range and Elk Numbers

Non-Suitable Area: The five hundred acres of crucial elk winter range would be lost due to projected mineral development on 2,470 acres. The general winter range would be split into two discontinuous halves. Elk numbers would decline by 50% resulting in a loss of 120 animals.

Suitable Area: No crucial winter range involved. No impacts.

Conclusion: All 500 acres of crucial elk winter range would be lost and a 50% herd decline (120 animals) would occur.

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

No short-term uses of the environment other than current uses (livestock grazing, dispersed recreation) are projected. Projected mining activity which could occur immediately or many years in the future could be either short-term or long-term in nature depending on economics, mineral quality, technology, etc. Short-term mineral activities, exploration and discovery, would have little impact on long-term productivity, whereas actual mine development could significantly affect long-term productivity of the environment, especially forage production.

IRREVERSIBLE AND IRRETRIEVABLE COMMITMENT OF RESOURCES

Complete development of 2,470 acres for mineral uses would eliminate 500 acres of crucial elk winter range and reduce the herd by 120 animals (50%). It is doubtful that once this winter range is altered that it could ever be reclaimed and herd size returned to present levels.

CHAPTER 5

CONSULTATION AND COORDINATION

Environmental Impact Statement Review and Public Participation

The wilderness study of the Eighteenmile WSA was conducted as a part of and in conjunction with the Resource Management Plan (RMP) for the Lemhi Resource Area. This allowed for not only a review of the WSA specifics but an opportunity to see how differing future WSA management scenarios fit into the future management of the entire resource area. The Draft Eighteenmile Wilderness EIS was included in the Draft Lemhi RMP/EIS as Appendix G.

Consultation and coordination with agencies, organizations, and individuals occurred throughout the planning process. Numerous opportunities were provided for the public to participate. Techniques ranged from informal one-on-one meetings to more formal meetings with the public and other agencies. The following list highlights key public participation activities for the Lemhi Draft Environmental Impact Statement/Resource Management Plan (RMP/EIS) and Draft Eighteenmile Wilderness EIS.

<u>Date(s)</u>	<u>Activity</u>
March - May 1983	- Met with the U.S. Forest Service and eight grazing associations on planning issues and the nine steps of the RMP process. A BLM wildlife temporary employee interviewed 40 landowners on wildlife issues in the Lemhi RMP area.
March 9, 1983	- Met with the Salmon District Grazing Advisory Board to discuss the Lemhi RMP and explain the nine steps involved in an RMP.
July 6, 1983	- Sent a newsletter to 350 people describing the planning process and asking for issues. Twelve people responded with issues.
July 7, 1983	- Published a Notice of Intent to Prepare Resource Management Plan in the <u>Federal Register</u> .
July 21, 1983	- Published a news article in the <u>Idaho Falls Post Register</u> concerning issues.
August 4, 1983	- Met with the Salmon District Advisory Council to get their input on issues.
November 24, 1983	- Sent a newsletter to 350 people asking for comments concerning the eight issues identified. Forty-five people responded (26 with comments and 19 asking to remain on the mailing list).

- December 8, 1983 - Published a news article in the Salmon Recorder-Herald on issues and planning criteria.
- March 22, 1985 - Sent a newsletter to 285 people concerning alternatives. Twenty-seven people responded (13 with comments and 14 asking to remain on the mailing list).
- March 26, 1985 - Met with the Salmon District Advisory Council on RMP alternatives.
- March 29, 1985 - Met with the Salmon District Grazing Advisory Board on RMP alternatives.
- April 2, 1985 - Published a news article in the Idaho Falls Post Register about the alternatives.
- April 4, 1985 - Met with the Salmon Federal Agricultural Committee to discuss alternatives.
- April 1985 - Met with nine Grazing Associations. Allotment categorization, RMP alternatives, and the RMP schedule were discussed.
- April 4, 1985 - Published a news article in the Salmon Recorder-Herald on the alternatives.
- April 30, 1985 - Met with representatives of the Salmon, Targhee, and Beaverhead national forests to coordinate wilderness planning for the Eighteenmile WSA.
- May 2, 1985 - Published a second Notice of Intent to Prepare Resource Management Plan/EIS in the Federal Register. This notice superseded the notice of July 7, 1983.
- October 1, 1985 - Draft RMP/EIS available to the public. Mailed out 360 copies.
- November 7, 1985 - Congressional staff representatives briefed in Idaho Falls.
- November 13, 1985 - Salmon Chamber of Commerce briefed on RMP.
- November 20, 1985 - Formal public hearing pursuant to the 1964 Wilderness Act held in Salmon. Three individuals testified.
- January 13, 1986 - Comment period closes.
- June 1986 - Release of Final RMP/EIS. Wilderness decisions not included in the Final RMP because only Congress can designate wilderness areas.
- (1987) - Final Eighteenmile Wilderness EIS filed with EPA.

AGENCIES, PERSONS AND ORGANIZATIONS RECEIVING THE DRAFT EIS

The following is a list of agencies, organizations, and individuals to whom the Draft Lemhi RMP/EIS has been sent.

Federal Agencies

Agricultural Stabilization and Conservation Service
Bureau of Indian Affairs
Bureau of Mines
Bureau of Reclamation
Department of Agriculture
Department of the Air Force
Department of Justice
Department of Transportation
Environmental Protection Agency
Federal Aviation Administration
Federal Energy Regulatory Commission
Fish and Wildlife Service
Forest Service
Geological Survey
National Park Service
Soil Conservation Service

State of Idaho Agencies

Governor John Evans
Office of the Governor, Paul Cunningham, Special Assistant
Department of Health and Welfare
 Division of Environment (Administrator)
 Division of Environment (Air Quality)
 Division of Environment (Hazardous Materials)
 Division of Environment (Water Quality)
 Division of Environment (Gordon Hopson)
Department of Fish and Game
 Regional Supervisor - Salmon, Idaho
 Regional Supervisor - Idaho Falls, Idaho
 Jerry Conley, Director - Boise, Idaho
Division of Financial Management
Department of Lands
 Director - Boise, Idaho
 Bureau of Lands
 Bureau of Minerals
 Bureau of Navigable Waters
 Bureau of Range Management
 Eastern Idaho Area
Department of Parks and Recreation
 Statehouse - Boise, Idaho
 Dale Christiansen, Director
Department of Transportation
 Division of Highways - Rigby, Idaho (Tom Baker)
 Division of Highways - Rigby, Idaho (J.R. Dick)
 Charles Rountree - Boise, Idaho

State of Idaho Agencies (Continued)

Department of Water Resources

Ken Dunn, Director - Boise, Idaho

Eastern Regional Office

Extension Range Specialist - Twin Falls, Idaho

Historical Society State Archaeologist

Historic Preservation Officer

Idaho Air National Guard

Idaho State University

Natural Resources Division

State Library - Boise, Idaho

University of Idaho

Local Governments

City of Salmon

Lemhi County Agent

Lemhi County Commissioners

Lemhi County Planning and Zoning Commission

Salmon Public Library

Salmon Valley Chamber of Commerce

Shoshone-Bannock Tribe

Organizations

Committee for Idaho High Desert

Idaho Archaeological Society

Idaho Cattlemen's Association

Idaho Conservation League

Idaho Natural Heritage Program

Idaho Wildlife Federation

Lemhi Cattle and Horse Growers Association

Minerals Exploration Coalition

Natural Resources Defense Council

Rocky Mountain Oil and Gas Association

Salmon River Trail Ride Association

Sierra Club

Wilderness Society

Advisory Councils

Salmon District Advisory Council

Salmon District Grazing Advisory Board

Elected Federal Officials

Senator James McClure

Senator Steve Symms

Representative Richard Stallings

Representative Larry Craig

Elected State Officials

Governor John Evans

State Senators and Representatives

In addition to the above, approximately 200 copies have been sent to other individuals.

LIST OF PREPARERS

The Lemhi Draft RMP/EIS was prepared by an interdisciplinary team with expertise in the land transactions, minerals and energy, forest management, range management, water quality, soils, wildlife habitat management, fisheries, outdoor recreation, cultural resources, fire management, and economics. All but one team member was from the Salmon District.

<u>Name (Position)/ Responsibility</u>	<u>Education</u>	<u>Experience</u>
Loren Anderson (Wildlife Biologist)/Wildlife	B.S., Wildlife Biology Research option, Colorado State Univ.	3 yrs. as Range Tech., BLM; 15 1/2 yrs. as Wildlife Biologist, BLM
Nancy Anderson (Archaeologist)/Cultural Resources	B.A., Anthropology, Univ. of South Fla., Tampa	9 1/2 yrs. as archaeologist, BLM
George Babits (Geologist)/Energy and Minerals	B.S., Geology, Washington State Univ.	1/2 yr. as Geologic Field Assistant, Placer Ltd.; 3 1/2 yrs. as Field Geologist, Soil Conservation Service; 3 yrs. as Project Geologist, Bureau of Reclamation; 5 1/2 yrs. as Geologist, BLM
Rob Carlin (Forester)/Forestry	B.S., Forestry, Univ. of Massachusetts, Amherst	4 yrs. as Seasonal Range Tech. (Fire); 1 yr. as Forestry Tech. USFS NE Forest Exp. Sta.; 2 yrs. as Forestry Tech., BLM; 5 yrs. as Forester, BLM
Bruce Easton (Range Conservationist)/Livestock and Range Management	B.S., Wildlife Biology, special emphasis Range Management, Humboldt	2 yrs. as Range Tech.; 9 yrs. as Range Conservationist, BLM State
Grant Harbour (District Planning Coordinator)/Technical Coordinator	B.S., Forest/Range Management, Colorado State University	5 yrs. as Range Con., 12 yrs. as Area Manager, 7 yrs. as Chief of Operations, 3 yrs. as Planning and Environmental Coordinator, all with BLM

Name (Position)/ Responsibility	Education	Experience
Lyle Lewis (District Hydrologist)/Hydrology and Watershed	B.S., Rangeland Resources, Oregon State University	4 yrs. as Range Con., BLM; 3 yrs. as Watershed specialist and Hydrologist, BLM
Jack Mills (Planner)/Quality Control and State Office Coordinator Idaho State Office	B.A., Political Science, Dartmouth College; MUP, Urban Planning, New York Univ.	15 yrs. as Planning and Environmental Coordinator, 8 yrs. with BLM and 7 yrs. with state government in NY and VA
Harley Metz (Supervisory Range Con.)/Team Leader Lemhi RMP	B.S., M.S., Range Ecology, Colorado State University	1 yr. as Research Tech. USFS; 5 yrs. as Natural Resource Specialist, BLM; 7 yrs. as Range Conservationist, BLM
Louise (Laurie) Perotto (Editorial Clerk)/Typist	High School	3 yrs. as Editorial Clerk, Salmon BLM District Office
Stephanie Snook (Realty Specialist)/Lands	Lands and Realty School, BLM Training Center, Phoenix, AZ	3 yrs. as Records Mgmt. Specialist, 9 months as Budget Analyst, 7 yrs. as Realty Specialist, all with BLM
Dave Wolf (Recreation Planner)/Recreation and Wilderness, Team Leader Wilderness EIS	B.S., Wildlife Biology, Colorado State Univ.; B.S., Outdoor Recreation, Colorado State University	1 yr. as Planning Tech., Fort Collins, Colorado, 1/2 yr. as Claims representative, Social Security Administration; 9 yrs. as Outdoor Recreation Planner, BLM

LIST OF COMMENTORS AND TESTIFIERS

The Lemhi Draft Resource Management Plan and Environmental Impact Statement including the Draft Eighteenmile Wilderness EIS was released to the Environmental Protection Agency and the public in October, 1985. During the public comment period, which ended January 13, 1986, testimony was received at a formal hearing and in 194 letters. A verbatim record of the hearing is reproduced in this document, along with those comment letters (160) pertaining to the wilderness suitability issue. Comment letters concerned only with items in the RMP unrelated to wilderness are not included. Comments in included letters which address RMP items not related to the wilderness issue are not answered in this Wilderness EIS (refer to the Final Lemhi RMP/EIS).

A number of similar letters were received and were combined for response purposes. Letter number 36 represents 105 similar letters. Substantive comments are identified and numbered on the hearing record or the appropriate letters. Substantive comments are those that question the adequacy or correctness of the data or analysis, or provide new information.

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*Because of the length of these comments, only the portions relating to the Eighteenmile WSA were reproduced here.

Written Comments

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*Hearing transcript included in full.

RESPONSES TO WRITTEN COMMENTS

- 3-1 Water quality and beneficial uses are adequately protected under the RMP's preferred alternative. The BLM is required to comply with the Clean Water Act and these standards will be met, as so stated in the Standard Operating Procedures (see Draft RMP/EIS, Page 53). We also recognize the reality that under a worse case situation, water quality could be accidentally degraded. In the case of the Eighteenmile Wilderness Study Area DEIS, we recognized the same reality, but on Page G-23, it was incorrectly stated that "sediment levels would exceed standards set by EPA". This sentence will be changed to read could, not would. The impacts to water quality discussed in the Wilderness EIS were predicted on substantial mining activity taking place. No mining plans have been received by the BLM, but if one is received, it would be subject to the Environmental Assessment process and all activity would comply with all environmental regulations, including the Clean Water Act.
- 5-1 There is no specific prohibition of overflight of wilderness by aircraft. Low-flying aircraft cause disturbance of the solitude of an area. Except in bona fide emergencies, search and rescue efforts and essential military missions such as training flights, low flight would be discouraged. Where low overflight is a problem, or expected to become a problem, wilderness management plans will provide for liaison with proper military authorities (including the Idaho Air National Guard), the Federal Aviation Administration, and pilots in the general area in an effort to reduce low flight, if at all possible.
- 6-1 The BLM is required to do a wilderness study and make recommendations to Congress.
- 6-2 Congress has stated quite clearly that livestock grazing should continue in the same manner and degree as prior to designation.
- 6-3 The partial wilderness alternative recommends those lands with the highest potential for mineral resources in the WSA for non-wilderness uses.
- 6-4 The Federal Land Policy and Management Act of 1976 requires the BLM to study all of its lands for wilderness suitability and to make recommendations to the Congress through the Secretary of the Interior and the President.
- 8-1 The 1980 Management Option Plan (MOP) is still the guiding document for us in anticipating a future trail route. On Page 3-24 of the Draft RMP/EIS, a differentiation is made between the miles of Continental Divide in the resource area (29) and the miles of trail recommended in the MOP in the resource area (20). In view of the continued relevance of the MOP and its recommendations, we can only agree with all of your site specific comments. However, since we do not have the authority to select the final trail

- location, the RMP must remain general in nature and await future completion of a routing study and site specific RAMP. The site specific comments will be better addressed at this point in time.
- 10-1 It has come to our attention that there may be more riparian problems associated with Eighteenmile Creek than we originally thought. Riparian areas will be addressed when developing an Allotment Management Plan for the Chamberlain Creek Allotment. Objectives will include maintenance or improvement of high quality riparian areas in the allotment.
- 10-2 The high percentage of good or excellent condition range (82%) of the entire allotment does not justify a 50% reduction in grazing.
- 11-1 Based on the existing environment and environmental consequences, the partial wilderness alternative is a reasonable recommendation. The rationale listed on Page 37 of the draft plan are only a summary of the specifics in the EIS and Appendix G. The all wilderness alternative was not selected. The BLM feels that sufficient rationale pertaining to past adjacent mineral activity, future mineral potential, the influence of adjacent nonwilderness Forest Service lands (all F.S. lands adjacent to the northern part of the WSA are recommended nonwilderness), and the shape and manageability of the area, has been given to support a partial wilderness recommendation.
- 11-2 With 82% of range in the Wilderness Study Area in good or excellent ecological condition, a 50% reduction in grazing is unwarranted.
- 15-1 The proposed action represents BLM's feeling that the value of a portion of the Eighteenmile WSA as a designated wilderness outweighs the value of the commercial forest land which would be inaccessible. As noted in Chapter I, the combined effects of market value and high production costs make this particular timber uneconomical to harvest now or in the foreseeable future.
- 15-2 BLM is required to assess the wilderness potential of specific study areas and make recommendations to Congress. Our analysis concludes that the only use of the area which would be eliminated would be that of off-road-vehicles that amounts to an estimated total of 15 user days. All other current non-motorized uses would be allowed to continue.
- 20-1 Existing use by recreationists is only one factor in our recommendation. Others are size, naturalness, outstanding opportunities for solitude or primitive recreation, and other existing or potential resource uses.
- 23-1 Multiple Use: "...the management of the public lands and their various resource values so that they are utilized in the combination that will best meet the present and future needs of the American people; making the most judicious use of the land for

some or all of these resources or related services over areas large enough to provide sufficient latitude for periodic adjustments in use to conform to changing needs and conditions; the use of some land for less than all of the resources a combination of balanced and diverse resource uses that takes into account the long-term needs of future generations for renewable and nonrenewable resources, including but not limited to, recreation, range, timber, minerals, watershed, wildlife and fish, and natural scenic, scientific and historical values; 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." (From Section 103, FLPMA)

27-1 See 11-1

28-1 Seven existing leases will expire in 1987; two leases expire in 1991; and two leases expire in 1992. All existing leases in the Eighteenmile WSA have the "Wilderness Stipulation" which severely limits activity on the lease in accordance with the district-wide Oil and Gas Leasing EA and the Interim Management Regulations. While there is no statutory prohibition against leasing in a WSA, BLM policy at the present time is that new leases will not be issued. When applications are received, they will be held in suspense until the policy changes or Congress decides whether a particular WSA should be included as part of the wilderness system.

28-2 Timber hauling distance is only one of many variables in predicting the economic viability of logging in the Eighteenmile WSA. Regardless of hauling distance and any other logging costs, the 2,283 acres of suitable Commercial Forest Land (CFL) in that area has a relatively low significance to the total timber industry in Lemhi County (Table 4-10 of the Draft RMP/EIS).

32-1 92% of the cost of the Lemhi RMP's preferred alternative is associated with range, wildlife and watershed management. Only 2.6% of the costs are associated with recreation (including wilderness) management. (See Draft Lemhi RMP page 4-91).

34-1 We assume the restrictions referred to apply to the nearby Forest Service Frank Church River of No Return Wilderness. No management plan for Eighteenmile has been written. No developed trails exist in the W.S.A.



United States Department of the Interior

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

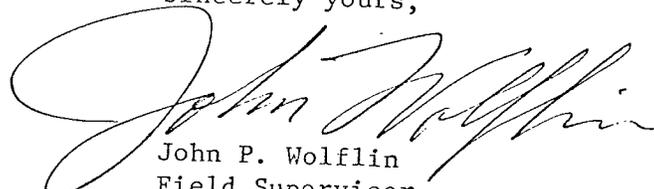
January 7, 1986

Kenneth Walker, District Manager
Salmon District Office
Bureau of Land Management
P.O. Box 430
Salmon, Idaho 83467

Dear Mr. Walker:

Our endangered species biologists have reviewed the draft Lemhi Resource Management Plan and Environmental Impact Statement. We concur with the content and direction of the Plan however, we request that as the Plan is implemented Section 7 consultation be considered where appropriate on specific projects.

Sincerely yours,



John P. Wolflin
Field Supervisor

cc: FWS, EC, Washington, D.C.



United States
Department of
Agriculture

Forest
Service

Salmon
National
Forest

P.O. Box 729
Salmon, ID 83467

Reply to: 1920

Date: January 13, 1985

Kenneth Walker
District Manager
Bureau of Land Management
Salmon District Office
P. O. Box 430
Salmon, Idaho 83467

Dear Ken:

We have reviewed the Draft Resource Management Plan and Environmental Impact Statement for the Lemhi Resource Area and have the following comments:

We suggest that you avoid establishing a policy in the Plan to always use three-wire fences. We believe the determination of what type of fence to use should be based on site specific conditions and the purpose of the fence. We feel that to establish a blanket policy for one type of fence will result in future problems with livestock management where a fence other than standard should have been used.

There are numerous allotments on which we share boundaries. As allotment management plans are developed for these areas, we encourage close cooperation between the BLM and Forest Service in order to achieve the best coordinated resource management.

Thank you for the opportunity to review your proposal.

Sincerely,

for RICHARD T. HAUFF
Forest Supervisor





U.S. ENVIRONMENTAL PROTECTION AGENCY
REGION 10
1200 SIXTH AVENUE
SEATTLE, WASHINGTON 98101

JUN 27 1986

REPLY TO
ATTN OF: M/S 443

Jerry Wilfong
District Manager
Bureau of Land Management
Salmon District Office
P.O. Box 430
Salmon, Idaho 83467

Dear Mr. Wilfong:

The Environmental Protection Agency (EPA) has reviewed the draft Lemhi Resource Management Plan and Environmental Impact Statement (Draft RMP/EIS) prepared by your staff. Thank you for providing us with additional time for our review. The Draft EIS evaluates alternative schemes for managing the resources on the 459,566 acres of the Lemhi Resource Area, Idaho. The EIS preferred alternative is expanded into a planning document in the draft RMP. The Draft EIS/RMP also includes a preliminary legislative EIS for management of the Eighteenmile Wilderness Study Area (WSA). Our detailed comments on all of these documents are enclosed. Our review was conducted in accordance with the National Environmental Policy Act (NEPA), and our responsibility under Section 309 of the Clean Air Act to determine the acceptability of proposed federal actions in terms of environmental quality, public health, and welfare.

We have rated the draft RMP/EIS as E0-2: Environmental Objections; Insufficient Information. A summary of the EPA rating system for draft EISs is enclosed for your reference. This rating reflects our primary concern that water quality and beneficial uses are not adequately protected under the EIS preferred alternative (and therefore the proposed RMP). We would support the redesignation of Alternative C as preferred in the Final EIS and its selection for implementation. This alternative better protects water quality by setting standards for livestock forage use in riparian areas.

Similarly, we have rated the EIS for the Eighteenmile Wilderness Study Area designation as E0-2 also. This rating results from the fact that none of the alternatives, except designating the entire area as wilderness, would comply with federally approved state water quality standards. As you will remember, the Clean Water Act requires that federal agencies comply with these standards. Thus, at this time the only alternative which BLM may currently select for implementation would be the all wilderness alternative.

3-1

Thank you for the opportunity to review the Draft EIS/RMP and the preliminary Draft Eighteenmile EIS. If you have any questions concerning our review, please contact Brian Ross of our EIS and Energy Review Section at FTS 399-8516 or (206) 442-8516.

Sincerely,



Robert S. Burd
Director, Water Division

Enclosures

cc: BLM (State Director)
NMFS
USFWS
IDHW
IDFG

U.S. ENVIRONMENTAL PROTECTION AGENCY
REVIEW REPORT

LEMHI RESOURCE AREA DRAFT RMP AND ENVIRONMENTAL IMPACT STATEMENT
AND THE EIGHTEENMILE WILDERNESS STUDY AREA EIS

Nesting EISs

Some confusion arose regarding the intended status of the "nested" Eighteenmile WSA environmental document. This confusion was attributable to lack of clear reference to this EIS in the Tables of Contents for the RMP/EIS (it appeared only in a table of contents for the appendices to the RMP/EIS), and the lack of explicit reference to two EISs in the Notice of Availability published in the Federal Register. Publishing such related EISs under one cover is a useful means of presenting all pertinent information so that agencies and the public may make a reasoned decision on the proposed actions, and your efforts to promote an early review of the wilderness management alternatives in this manner are commendable. Clearer reference that this has been done would be helpful for future BLM projects.

Existing Conditions

A thorough discussion of existing resource conditions is essential to the public's ability to determine whether the proposed planning direction can adequately protect those resources. For example, where riparian areas are already in unsatisfactory condition, riparian-related resources would not be protected by maintaining the historic level of impacts. Similarly, the adequacy of a trend toward improvement must be measured against the other resources being affected; anything short of the maximum potential rate of improvement regarding degraded chinook salmon habitat, for instance, would be extremely difficult to justify.

The EISs (both for the RMP and the Eighteenmile WSA) should present much more information regarding existing conditions. This is especially important for the following resources:

1. Water quality. The degree and areal extent of existing water quality problems should be discussed more thoroughly. Water quality problems related to existing minerals, timber harvesting, and grazing activities should be disclosed. Parameters of most interest include temperature, turbidity, dissolved oxygen, pH, and coliform bacteria. Comparison to State of Idaho Water Quality Standards should be made somewhere in the EIS.
2. Fish and Fish Habitat. The EISs should discuss where fish habitat exists in relation to other activities, and identify the species, or "species of special concern" (identified by the Idaho Department of Fish and Game) that exist in the area, as well as discuss their status and any trends with respect to population, sedimentation, and water quality as it affects fishery habitats.

3. "Critical" and "Crucial" habitats for fish, game and plants. These terms seem to be used rather loosely in the Draft RMP/EIS. If criteria for the identification of such habitats are indeed as given in the Glossary (page 5-21 in the draft EIS for the RMP), it is important that the EIS consider the compatibility of planned activities in any of them in detail. We believe that such areas should have especially protective and specific standards associated with them. Critical and crucial habitats should be clearly identified wherever they occur. This apparently has been done only for deer and elk.
4. Soils. Specific areas having significant erosion or instability potential should be identified. This could most easily be done by summarizing such conditions in the descriptions in Appendix E.

Cumulative Effects

The Draft RMP/EIS discusses evaluating the environmental effects of planned activities on a case-by-case basis. Cumulative and combined effects of activities should be discussed as well. Ideally, the RMP/EIS itself would evaluate the potential cumulative and combined effects of the various management alternatives, at least generally. Short of this, the Final RMP should describe the process the BLM will use for evaluating such effects.

We have discussed the use of "area analyses" with the national forests adjacent to the BLM Lemhi Resource Area. Evaluations similar to the Forest Service's area analyses should be useful for the BLM, as well. Such an analyses would consider the effects of several similar activities, and a variety of different types of activities, over a fairly large area and period of time.

Whatever process the Final RMP and EIS discuss, the following points should be addressed. What would be the areal coverage of a single evaluation (e.g., 3rd order drainages)? What period of time between planned activities would be considered? How could planned or ongoing activities be modified if these evaluations predicted significant cumulative effects? We believe that these evaluations should receive public review as draft EAs or EISs. Activities under the Resource Monitoring and Evaluation Plan should be coordinated so that potential cumulative and combined effects can be detected.

Riparian Areas

The proposed RMP (page 54) states that "All BLM initiated or authorized programs and actions potentially affecting wetland-riparian areas will comply with the spirit and intent of Executive order 11990 (Wetlands)..." in terms of avoiding "long and short-term adverse impacts associated with the destruction, loss, or degradation of wetland-riparian areas."

We are pleased to see this direction explicitly stated. However, the proposed RMP does not appear to provide protection of riparian areas that is commensurate with these statements.

In particular, heavy use of riparian vegetation by livestock (70 to 90 percent) would continue. It is unclear whether, overall, the current downward trend would continue, as it would under Alternative A (Draft EIS, page 4-12), or show a slight improvement as stated for the BLM preferred Alternative F (Draft EIS, page 4-87). This confusion arises because it is stated (Draft EIS, page 2-1) that the proposed action regarding grazing is as described in Alternative A and not Alternative F. Does this refer only to stocking levels, or does it extend to all grazing-related effects as well?

Even Alternative C, emphasizing amenities, may not offer adequate protection to riparian areas. The Draft EIS (page 2-21) states that "livestock would be removed from pastures when 50 percent utilization of the riparian forage was reached." This is the most stringent of all the alternatives presented. However, the 50 percent utilization standard would not necessarily afford appropriate protection to water quality (from coliform bacteria, sediment, or temperature changes), streambank stability (from trampling), or important fish habitat (from gravel sedimentation and from water quality changes).

Therefore, although we support Alternative C over the other alternatives presented, the Final EIS should more fully evaluate the various environmental effects attendant with different stocking levels (as they affect riparian areas), in order to show whether even Alternative C is adequately protective of all the resources BLM must manage. Specific standards reflecting the outcome of this evaluation should then be presented, along with an outline for monitoring whether the standards are being met.

We believe that the "spirit and intent" of Executive Order 11990 would not be reflected in any alternative which allows continuing degradation of riparian areas, or which did no more than maintain unsatisfactory conditions. This is particularly true in western states (including Idaho) where grazing on public lands accounts for a very small percentage of national production, but where riparian areas are of great importance to remaining fish and wildlife populations.

Resource Monitoring and Evaluation Plan

The categories presented are appropriate. Some of them should be expanded, however, to better reflect the importance of particular resources and the variety of planned activities that can affect them. In particular, riparian areas should be comprehensively treated as a separate element. Also, would this plan, outlined in Appendix I, change if the preferred alternative were changed? If so, how?

Under Vegetation, the criteria "warranting a decision change" is 50 percent utilization on native range; riparian areas and meadows, etc., are listed as special cases where variation-in allowable utilization level would be required. What variations would be considered, and where?

Greater emphasis should be placed on monitoring within the watershed and fisheries elements. Monitoring for water quality problems should occur in conjunction with any individual activities predicted to affect water quality (for example, timber harvest and road construction activities). The locations and frequency (every 2 years) proposed would be useful in monitoring trends, but would not provide timely information regarding the need to modify individual problem activities. For wetland/riparian areas and fishery habitat, streambank instability and heavy utilization would be monitored. How much instability would warrant modification of activities? Ideally, a trend toward instability would be rectified before stability is completely lost. Also, for fisheries, monitoring of in gravel sedimentation should be included where spawning or rearing habitat exists. We would suggest a standard of no more than 20 percent fines by depth where habitat for anadromous fish or species of special concern occurs. Here again, a monitoring frequency of once in 2 years is only useful for following trends and should be increased for specific activities and in problem areas.

Standard Operating Procedures

This section of the proposed RMP (page 38-58) defines the manner in which most activities will be managed. Reference to a cumulative effects program should appear in this section. Several other comments and suggestions regarding this section are presented below, by program category.

Energy and Minerals:

The BLM 3809 regulations should be discussed here. In particular, processes available to BLM to protect resources from potential adverse effects of minerals exploration and development should be summarized. When must Plans of Operation be filed and what must they contain? Will these receive review by other agencies or the public? What requirements can BLM attach to right-of-way permits and Plans of Operation (including reclamation bonding)? The "standard stipulations" (page 45) for oil and gas leasing should be appended to the RMP. It is stated (page 43) that "During any given year, the authorized officer could waive the special restrictions if actual conditions did not warrant them." Would such a waiver be coordinated with the appropriate state agencies (e.g., Health and Welfare, Fish and Game)? With federal agencies and tribes? Wouldn't such be a significant modification to the approved RMP and require revision and public review of the environmental documentation.

Forest Management:

Is there any old growth in the Lemhi Resource Area? If so, how would it be managed? Why is further logging reasonable prior to elimination of the existing backlog of areas without adequate restocking? What will keep this backlog from growing?

We are pleased that allowable harvest methods (i.e., tractor skidding) are tied to slope and land type. Support for the adequacy of the particular slope criteria given (page 46) should be provided in the final documents.

In our view, the most appropriate management for riparian timber is its designation as unsuitable for harvest. To the extent that harvesting occurs in riparian areas, it should be done in such a way that impacts are minimized. Specific protective standards for such harvests should be presented in the final documentation. (Also see Wildlife and Fisheries Program, below.)

Range:

We assume that livestock use adjustments may include temporary suspensions and closure. In this context, "unsatisfactory resource conditions" should be added to the list necessitating temporary suspensions and closures (page 48). Also "Environmental protection considerations" should be added under Grazing Systems.

Wildlife and Fisheries Program:

What necessitates the development of habitat management plans or multiple resource management activity plans? We note the different alternatives would develop these plans differently. Do such plans receive public review? We believe they should, for example, as draft EAs.

Seasonal restrictions could be waived, as under Energy and Minerals, above. The same questions should be answered here as we posed for Energy and Minerals. Riparian habitat would appropriately appear under a separate heading. The list of techniques that "can" be used to lessen impacts (page 51) is helpful, but lacks meaning without standards defining which would be necessary under which circumstances. Monitoring (as a Standard Operating Procedure) should also receive emphasis in ensuring that particular techniques are adequately lessening impacts. What constitutes "adequate moist sites" in terms of timber harvest? When would untreated buffer strips be included in timber sale stipulations? We believe that wetlands and riparian areas in general are important moist sites, and that timber harvesting should generally not occur in them.

Soil, Water and Air:

The soil loss value of 1.0 ton per acre per year given as "tolerable" (page 53) should be further discussed. It appears to refer to rangeland productivity; how are other resources (i.e., water quality and fish habitat) affected? How would erosion on timber lands and at mines be kept tolerable? Are there municipal watersheds in the Lemhi Resource Area? Specific management will be required to protect water quality in such cases; stipulations should be outlined in the RMP. Domestic water supply may require separate treatment (its own heading) in this section of the Final RMP.

Detailed Management Plans:

Fish habitat and water quality are not discussed under this heading. Considering the variety of activities capable of adversely affecting them, they should be included. Also, as discussed previously, cumulative effects need to be addressed; this appears to be an appropriate place to do so.

EPA Preferred Alternative

We support redesignation of Alternative C as preferred in the Final EIS, with its expansion into a management document in the Final RMP. We do not believe that the other alternatives presented would adequately protect water quality and associated beneficial uses (such as fish and domestic water supplies), or riparian areas and their related resources and values. Furthermore, as the Draft EIS points out, the overall economic effects to Lemhi County of allowing fewer AUMs of livestock grazing than currently exist would be insignificant (a loss of one half of one percent of current permittees' personal income, and receipts to state and local governments one percent greater than FY84).

Our support for Alternative C is qualified, however, in that analyses were not presented in the draft documents which showed that even this alternative can adequately protect water quality and riparian values. If such analyses conducted for the final documents show a need for still greater protection, new alternatives would need to be analyzed in those documents in order to assure that water quality and riparian values are adequately protected. The critical factor is that the alternative selected for implementation in the Final EIS and the following Record of Decision must be one which can comply with the applicable water quality standards as demonstrated in the Final EIS.

Included with our support for Alternative C is support for the "All Wilderness" alternative in the Eighteenmile WSA EIS (Appendix G). Only this alternative would adequately protect water quality in the WSA; as is summarized in Table G-1, all other alternatives would allow activities which would produce unacceptable sediment levels. As noted in the transmittal letter, this appears to be the only alternative capable of complying with the Clean Water Act.

Mining would be generally excluded in the WSA under this "All Wilderness" alternative, but livestock use would continue. This EIS states (page G-19) that "Adverse impacts on water quality at present are said to be "at acceptable levels" no definition is given for this level, however. Also, no mention of trends is made. We are therefore able to give only qualified support even to the "All Wilderness" alternative at this time. The Final EIS for the WSA should evaluate in detail whether the livestock usage proposed is appropriate. (For example, what is the condition of riparian areas in the WSA presently? Are there water quality problems from coliform bacteria now? What is the condition of fish habitat in the WSA?)

Other Specific Comments

The following comments are provided primarily to aid in continued editing and refinement of the draft documents. They should not be considered to carry the same weight, in terms of EPA's concerns, as the preceding comments.

Draft EIS, pages 4-100 through 4-105. Short-term use versus long-term productivity should be evaluated for all the alternatives, not just the BLM preferred alternative. This applies to the Irreversible or Irretrievable Commitment of Resources" analysis, as well.

Appendix D. A similar analysis should be provided for the other alternatives. This would help address the uncertainties expressed earlier for the "bottom line" acceptability of each of them. We disagree with the statement on page D-3 that the preferred alternative is the "most reasonable approach to watershed improvement that can be expected" within the 20 year planning period. Alternative C would allow improvement on five to ten times more acres, while making only very minor overall economic change. Similarly, the last sentence of page D-5 implies that only 275 acres of riparian area improvement is "realistic." Since all the alternatives presented have been defined as reasonable (i.e., capable of being implemented), we suggest such statements be deleted in the final documents. Finally, it would be useful if acreages were included under each category in Table D-2.

DRMP, page 19. Given the definition of critical habitats in the Glossary, why are there no ACEC's in the Lemhi Resource Area? What is the difference between these designations?

DRMP, page 53. The basis for the criteria for sagebrush canopy cover should be given in the final documents.

DRMP, page 58. Does the BLM periodically produce summaries of upcoming EAs and EISs? If so, we would appreciate receiving them so that we may better identify projects where EPA involvement would be most appropriate.

DEIS, Table S-1. As is summarized here, the allowable cut of 1.07 million board feet per year is consistent among all the alternatives. How is this reconciled with the discussion in Chapter 4 of different losses in harvestable yield (e.g., 238 thousand board feet per year in Alternative C due to set-asides and closures?)

DEIS, page 2-3. Please explain the statement, "as defined by BLM policy, Alternative A is the proposed action for livestock grazing" (emphasis added).

DEIS, page 2-3. The statement that "The timber industry in Lemhi County is already depressed because of a shortage of timber" is at odds with statements made in the DEIS and proposed Forest Plan for the adjacent Salmon National Forest. There, less than half of the offered timber is expected to sell. The timber industry is seriously affected by a variety of circumstances. Reducing these causes to a single broad statement serves no useful purpose.

DEIS, page 2-41. Conflicts between livestock grazing and riparian related resources would continue under Alternative F. The statement that "No conflicts with other resources were identified at the proposed stocking level" should be rephrased or better documented in the final documents.

DEIS, page 2-44. The addition of the qualifying phrase, "if practical" to the second full paragraph on this page conflicts with the statement on page 25 of the DRMP that surface disturbing activities affecting fisheries habitat will not be allowed. Which is correct? Also, Class III streams are specified on page 2-44; this is contrary to page 25 of the DRMP, as well. We support the statement in the DRMP.

DEIS, page 3-16 and 3-17. This fish habitat discussion reflects only the economic value of fishing on BLM land. For both resident and anadromous fish, this could greatly underestimate the overall value of these fish even in terms of only this one human use (i.e., fishing in other areas should be considered as well; for anadromous fish, this would extend to the ocean fisheries). This analysis completely ignores the importance of fish for other purposes; it also ignores the status of the fish populations themselves (for example, the precarious status of chinook salmon in the Salmon River Basin renders each remaining fish and all potential habitat extremely valuable to the continued existence of those populations. Fish and fish habitat deserve much more comprehensive treatment in the Final EIS.

IDAHO STATE HISTORICAL SOCIETY

610 NORTH JULIA DAVIS DRIVE BOISE, 83702



November 1, 1985

District Manager
Bureau of Land Management
Salmon District Office
P.O. Box 430
Salmon, Idaho 83467

Dear Sir:

Thank you for sending us a copy of the Lemhi Resource Management Plan and EIS. Our comments concern the management of archaeological and historic properties in the planning unit.

As a general observation the preferred alternative (F) appears to be a reasonable management approach given current funding levels. The standard operating procedures for the protection of archaeological and historic sites are adequate to meet the various federal laws and regulations.

We are pleased to see the commitment to formulate specific cultural resource plans for the Chief Tendoy Cemetery, the Lewis and Clark Trail, and the Salmon River corridor in the preferred alternatives. We are not familiar with "Indian Area A" or "Indian Area B," nor did we find a description of them in the document. If we can be of help in preparing these plans, please let us know.

We want to take issue with the underlying assumption in the sections dealing with cultural resources management that cattle and range improvements adversely effect archaeological and historic properties. Obviously cattle do affect such properties when they are allowed to congregate on sites for long periods of time. However, we believe range improvements designed to disperse cattle across the range and move them away from the immediate area of springs actually reduce impacts to archaeological sites. The Challis range improvements, especially the spring developments, are good examples.

Thank you for allowing us to comment on the plan. If you have any questions concerning our comments, please contact us.

Sincerely,

A handwritten signature in cursive script that reads "Thomas J. Green".

THOMAS J. GREEN

State Archaeologist

⁵⁹State Historic Preservation Office

TJG:rm



IDAHO AIR NATIONAL GUARD
124TH TACTICAL RECONNAISSANCE GROUP
BOISE AIR TERMINAL (GOWEN FIELD)
P. O. BOX 45, BOISE, IDAHO 83707

REPLY TO: Bureau of Land Management
ATTN OF:
SUBJECT: Lemhi Resources Management Plan - 1601 (933)
TO: District Manager

1. The 124th Tactical Reconnaissance Group currently schedules and maintains a Military Training Route (MTR) which overflies the southern portion of the Lemhi Resource Area. This MTR designated IR 301/307, is used by numerous Air Force, Navy, Marine, National Guard and Reserve Units. Last year 425 missions were conducted in IR 301/307. The mission totals for 1985 should be even higher. This MTR was established in 1979 and has experienced a continual increase in missions flown since that time.

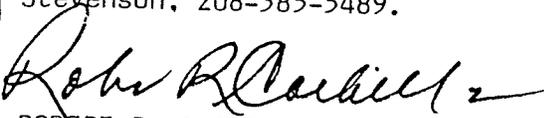
2. Aircraft utilizing the MTR are authorized to employ terrain following operations from 100 ft. above ground level (AGL) to approximately 7,000 ft. AGL in certain areas. Aircraft speeds vary from 300 kts ground speed to 600 kts ground speed depending on aircraft type and specific mission. The objective of these missions is to simulate underflying enemy detection systems in a hostile environment.

3. When MTR's are established, populated areas, low altitude civil air traffic, and noise sensitive areas are considered and avoided to the maximum extent possible. For these reasons many remote, sparsely populated areas controlled by the Department of the Interior become optimum training grounds for high speed, low level flight. The Department of Defense has published written policy concerning flight in these areas. As stated in a circular from the Federal Aviation Administration (AC No. 91-36A) The DOD advises, "military aircraft may at times overfly areas managed by the Department of the Interior at lower than the recommended 2,000 ft. minimum, but in compliance with the minimum safe altitudes prescribed in FAR 91-79. Such deviation will occur only when essential to the mission being conducted". Use of this airspace down to the minimum published altitude at maximum airspeed is essential to the accomplishment of our tactical training mission and is in compliance with FAR 91-79 and DOD Policy.

4. It should be apparent our flight operations will directly impact the recreational qualities of the three special recreation management areas described in the preferred alternative F. Of special note is the fact that the entire proposed Eighteenmile Wilderness Area lies beneath the IR 301/307 corridor. With recreation being recognized as the principle use of these lands, the associated noise complaints that will be generated would eventually reduce the usable airspace and adversely affect the training mission of all involved units.

5-1

5. Therefore, the 124TRG strongly advises that military aircraft overflight of the Lemhi Resource Area be considered prior to the establishment of the three SRMAs. In addition there is a direct conflict between the tactical training mission and the wilderness characteristic of solitude. We must object to the proposed establishment of the Eighteenmile Wilderness Area. We cannot subject our airspace to possible reduction due to noise complaints generated by military aircraft performing their mission over newly established recreational areas. Should you have any questions please contact Captain Jay Stevenson, 208-385-5489.



ROBERT R. CORBELL, II. COLONEL. IDANG
Commander, 124TRG

Cy to: FAA/AFREP
AFRCE WK/ROV
HQ 12AF/DOTX
TAG/ID



Lemhi
Soil and Water Conservation District

201 North Church Street Salmon, Idaho 83467 Phone: 756-4261

SUBJECT: Resources - Lemhi Area
Draft Management Plan

DATE: January 9, 1986

TO: Jerry Wilfong
Lemhi Resource Area Manager
Bureau of Land Management
Box 430
Salmon, Idaho 83467

Jerry:

Thank you for the opportunity to comment on the Bureau's Draft Management plan for the Lemhi Resource Area.

As individuals and as a District Board we are concerned with the management of our public land resources as they are an important part of our, and our cooperators' operations.

We wish to direct our comments in two ways: 1. in a general scope then; 2. on more specific items.

First we would like to commend the Bureau Staff for a document well done. We feel this document is a very good assessment of the status of the resource area in general. We also feel, as is stated in the manuscript, the "... general range condition is probably the best it has been in about the last 100 years."

Our first general area of comment is on the Wilderness proposal for Eighteen Mile Creek. The District's policy is to oppose any further designation of wilderness in Lemhi County. We are opposed of the

designation of Wilderness in the eighteen mile drainage for the following reasons:

6-1 | 1. There has not been any evidence presented in your document, that indicates a National or local need for wilderness acres in the Lemhi Resource Area. We agree that most of the eighteen mile unit meets the criteria for wilderness but feel it will continue to do so under current or other management without the wilderness designation.

6-2 | 2. Wilderness designation of this area would put unnecessary regulations on the grazing permittee. Although wilderness allows for grazing it becomes a secondary use, in our opinion, and more stringently regulated. Regulations by agencies are always subject to manager's interpretations. Often times these interpretations are subjective in nature and in most cases would work against the grazing permittee, rather than for them.

6-3 | 3. Wilderness designation of the eighteen mile area would unduly hinder the mining industry. We feel mining can be conducted to the benefit of the economics of the county, when properly planned and carried out, without affecting the environment.

4. Wilderness designation will close the door on any commercial timber harvest in the area. Although only a small portion of the proposed wilderness area is commercial timber, who is to say the timber won't be needed down the road. We propose that these lands be managed semi-motorized and non-motorized areas and not designated wilderness.

In general we can not support the preferred alternative "F". This alternative

is much to restrictive, and while a multiple use alternative, it leans far to heavily to the protectionist side of things, and restricts the livestock operation. We feel a multiple use alternative that protects the resource base from degradation and maximizes resource use, is the one that needs to be offered. We propose the following alternative.

A. LANDS: All lands suitable for agriculture would be disposed of through desert entry, or sold to private land holders. This would be the highest and best use for these lands. Suitable acreage would be based on the ability of the land to produce a crop, without degrading the soil or water resource.

Lands unsuitable for agriculture that are not manageable by the BLM, because of the location, be it access or small parcels, or what ever it is that makes it not manageable would be sold.

No Land would be acquired under this alternative. Critical land to wildlife that is in private ownership would remain in private ownership. The wildlife values on these lands should be protected in coordinated management agreements which allow for these values in the coordinated allotment management plan.

4,405 acres would be restricted from right-of-way development to protect critical cultural resources as identified under Cultural, Alternative F.

B. MINERALS: We favor alternative G's section on minerals. We are pro mineral exploration and development. However, we feel there are cases when the current uses need to be preserved over the speculation

that their may be minerals, of speculative value to be mined. Alternative "G" seems to best preserve these used without unduly restricting mining activity.

C. FOREST MANAGEMENT: We believe that the Forest Management prescribed under Alternative "F" to be the best, with the exception of the Wilderness. Our preferred alternative would use "F" as is, with the wilderness restriction deleted and added to the base.

D. CULTURAL: Our preferred alternative includes the same as Alternative "F". We feel this is essential to protect our Culteral Heritage from development and believe Alternative "F" does it best.

E. RANGE: We feel that the initial stocking level should at least be the five year average. However this is more on an allotment by allotment basis, some allotments could stand more, some could stand less. We feel the goal for the next 20 years in range should be to go from the five year average use figure of 52,541 AUMs to the active preference of 63,898 AUMs. This would be our preferred alternative.

Short term reductions would be necessary as range improvements were being implemented, but this would be done by agreement under coordinated management plans. We feel at a minimum all "I" category allotments should be developed into coordinated management plans.

Range improvements would be done on a cost benefit relationship. We feel there are at least 25,000 acres that could be improved with brush control, in addition to these acres, 5,000 to 8,000 acres need brush

control and reseeding, at least 50 springs could be developed. Pipes, reservoirs and fences should be done on an economical basis. These should be held to a minimum since these facilities are costly to build and maintain.

Riparian areas need to be considered as part of the allotment plan. These can't be separated and treated by themselves, nor can the range area adjacent to these be treated separate. We recognize there are problem areas and feel these need to be, and can be dealt with, in the allotment planning process.

We strongly feel the current range condition indicates proper management is occurring on most of the public range. Development and implementation of sound allotment management plans could lead to range improvement with the number of AUMs going from the five year average to the active preferences. We do not feel there is sufficient evidence that supports alternative "F" which is a decrease of 18%

F. WILDLIFE: We feel as a district that the current wildlife numbers, whatever they may be, are sufficient and all the current winter habitat can support. This is evident by the number of private land owner complaints about predation of private forage by wildlife. There is no way another 3,000 head of deer could be supported by the current winter habitat on public land. We propose the following number of animals:

Deer: 8,000 - wintering deer
Elk: 2,000 - wintering elk

Sheep: 200 - wintering sheep
Antelope: 2,800 - wintering antelope

or 6,080 AUMs.

We all know it is impossible to arrive at exact inventory figures for

AUMs. Therefore again we propose that wildlife be a part of allotment management plans, and then where areas of conflict exist between livestock and wildlife, those be resolved in the planning process.

Fences would only be modified if it were proven that a need existed. Ie. it was demonstrated that a particular fence was impeding migration. We feel that most fences are only a small nuisance to wildlife. Again fences and fence specifications would be part of the allotment management plans.

G. WATERSHED & FISHERIES: We would include in our alternative the watershed and fisheries portion of Alternative F. There is a need for riparian management but only as a part of an overall management plan.

We question the statement that 50% of the AUMs come off 2% of the land base (riparian area). This would mean 26,000 AUMs are coming off of 9,200 acres. Or the riparian zones are producing 2,300 pounds per acre. We question this because:

1. If there is 9,200 acres along 97 miles of stream then the average width of the riparian zone along the streams would be 790 feet or about 95 acres per mile of stream. We feel the average width would be closer to 200 feet or 24 acres per mile.

2. 2,300 pounds per acre is an extremely high figure. Irrigated acres along the Lemhi are producing around 3,000 pounds per acre. This is cleared, with irrigation and no fertilizer. For the most part we feel a 1,200 pound figure would be a closer figure to the realistic situation.

Therefore, if we figure $97 \times 24 = 2,328$ acres of riparian habitat along the streams, plus an estimate of 1,000 acres in other riparian areas, we would have 3,300 acres of riparian habitat. $3,300 \times 1,200 = 3,960,000$

pounds times .50 utilization equals 1,980,000 pounds of feed divided by 800 pounds per AUM equals 2,475 AUMs of feed in the riparian zones. $63,000 - 2,475 = 60,525$ AUMs + 6,000 wildlife AUMs = 66,500 AUMs needed from 456,000 acres or 6.8 acres per AUM. 6.8 AUM would mean the average production per acre, of forage, would be around 117 pounds.

If we use Wyoming Sage-Bluebunch Wheat (8-12 ppt) habitat type, as an average for the county. This site produces about 400 pounds in good conditions. 60% of this is grass or 240 pounds, then 50% of this would be 120 pounds of feed available. This would indicate that the 6.8 acre would be a realistic figure to plan for and provide forage for the 6,300 AUMs for livestock and 6,000 AUMs for Wildlife.

We feel our preferred alternative allows for the following:

1. Disposal of lands that are not manageable or are better suited for agriculture.
2. Does not acquire any private land.
3. Eliminates wilderness designations in the eighteen mile area, but manages the area to retain the wilderness values.
4. Provides maximum protection for cultural and recreational values.
5. Provides opportunity for mineral exploration and development, yet protects critical areas from surface disturbance.
6. Allows for maximum forest management.
7. Continues the range improvement and provides for better management of rangeland habitat.
8. Stabilizes wildlife at existing population for the most part.
9. Improves riparian management with the allotment management plans.

SPECIFIC COMMENTS:

1. Page 13, item 6. This issue statement leads one to believe that all riparian area degradation is due to livestock grazing! Are there not other factors that influence riparian areas such as flooding, wildlife, ice, etc?
2. The first paragraph states there is a need to identify acres for access acquisition for public recreation. Is this the role of the Federal Government to acquire private land right-of-ways for public use? Wouldn't this be a more appropriate role for private groups to acquire their own access?
3. Page 17. We applaud the recognition by the Bureau that control of noxious weeds is an important management concern!
4. Page 22. Item 1. Disposal. This states 5,600 acres would be acquired - 4,495 would be sold or traded to private or public owners. Where would the 1,105 acres come from that will make up the difference? It should not be the role of the Federal Government to acquire additional lands unless it is in the general public's best interest! We don't feel any of the land proposed to be acquired is in the general public's best interest!
5. Stated in your plan, there is 30% of the range in fair and poor range condition or approximately 138,000 acres. Your preferred alternative states only 22,471 acres would be improved to good, this is only 16% of the 30%. We feel if you were to implement alternative "F" that there would be at least 50,000 if not more of the fair and poor range improved to good. Brush control and seeding alone in the alternative provide for 26,700 acres of improved range.

Until allotment management plans are developed there is no way to assess how many acres of brush control, seeding, pipe etc., needs to be

implemented for range improvements. Nor is it known what is actually feasible.

The draft management plan should be written with a goal of improving 50,000 acres of fair and poor condition range over the next 20 years.

6. Page 24. Shifting of sheep to cattle in the Little Eight Mile to to Eighteen Mile Creek area. Is this consistent with the plans of the operator or operators? Is this consistent with the exchange in use policy stated in the standard operating procedures?

7. Page 28. The first paragraph under D states the preferred alternative meets or exceeds the demand for livestock grazing. Is this true? The demand for livestock grazing is 63,000 AUM. The preferred alternative only allows for 43,000 to start with and then builds to 52,000 over the next 20 years.

8. Page 30. Item "I" states the preferred alternative recommends that 14,796 acres be designated wilderness in the Eighteen Mile drainage. We feel it is mandated by congress that the Bureau assess acreage suitable for wilderness designation. We agree that the acreage identified meets the wilderness criteria for designation.

6-4 | What we con't agree with is the Bureau recommending it as wilderness. Unless the Bureau feels this is the only way to protect critical resource values or that there is overwhelming public demand for this area to be designated as wilderness, then it should be left up to the public if they want wilderness designation in this area. No evidence is presented for either case in the document. Therefore, we feel justified in recommending a semi-motorized and non-motorized status for this area, or

or management as is.

9. Page 3-16. First paragraph indicates 37% of the elk winter range is in less than satisfactory condition. What does this mean? These areas need to be identified and a reason given why the classification is less than satisfactory. How will the preferred alternative improve these? What percentage will be improved? What will be the cost? Who pays the cost?

10. Page 3-16 under deer. It would seem from this discussion that poor and fair ecological condition is good for deer. The statement also does not justify the proposed alternatives 35% increase in deer numbers.

11. B-11 Item 3. Increased grazing, when accompanied by range development, would change existing range trend. Is this always true? What is the documentation or research literature to support this assumption?

12. B-11 second paragraph. What documentation supports the range and wildlife staffs feeling that the majority of allotments were not able to provide enough forage for wildlife needs? It would seem that if 70% of the area is in good range condition that this statement is not true.

13. B-11 until allotment management plans are developed for the "I" allotments no stocking levels could be set. The majority of these allotments in the "I" category have cattle distribution problems. It does not seem justified to make reductions until plans are developed to solve the conflicts in each allotment.

14. Page 41. We take exception to the first criteria in determining agricultural land suitable for development. Because of our growing season alone, there are no class I or II soils in Lemhi County. Many of the ranches in Lemhi County are using class IV land to grow forage crops on. Because of the limited crops (hay or small grain) they are able to use these class IV lands without harming them. There are probably parcels that are suitable to grow forage or that are 70% to 80% class IV. We propose that each 40 acre parcel be classes as suitable if they are 80% class IV or better, rather than the criteria used on page 41.

15. Under the standard operating procedure for Energy and Minerals, (page 43) this section should spell out the standard procedures for operating and reclaiming mined lands.

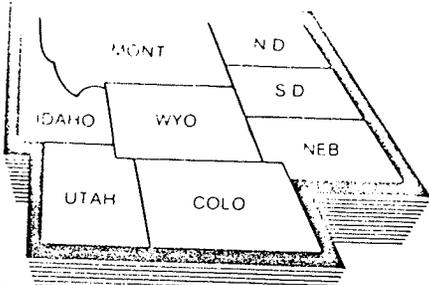
16. Page 53. The amount of soil erosion that is tolerable is more dependent on the soil type than the cover. Our information tells us there is a range between 1 and 5 tons that could be lost, depending on the soil type. Use of the soil survey should be made to predict the allowable loss of a soil. This should be a part of the management plan.

17. Minimum stream flow for Big Timber Creek. There is not sufficient water to fill all decrees in Big Timber Creek in the latter part of the year. To get a minimum stream flow the Bureau would have to acquire several private water rights. We don't feel this would be a beneficial use of the water for the taxpayers. This proposal should be dropped from the plan.

Dennis R. Studebaker, DR

Dennis R. Studebaker, Chairman
Lemhi Soil Conservation District

DRS/ras



Rocky Mountain Oil & Gas Association, Inc.

345 PETROLEUM BUILDING • DENVER, COLORADO 80202
303/534-8261

December 18, 1985

Mr. Jerry Wilfong
Lemhi Resource Area Manager
Bureau of Land Management
P. O. Box 430
Salmon, ID 83467

Dear Mr. Wilfong:

On behalf of the Rocky Mountain Oil and Gas Association (RMOGA), I would like to offer our comments on the proposed Resource Management Plan (RMP) and Draft Environmental Impact Statement (DEIS) for the Lemhi Resource Area in Idaho. RMOGA is a trade association representing hundreds of members who account for more than 90% of the oil and gas exploration, production and transportation activities in the Rocky Mountain West. As a result of this, our members have a vital interest in how the BLM manages its lands, particularly with respect to mineral resource activities.

We are concerned that energy and mineral resources have not received adequate consideration in the planning process for the Lemhi RMP. The exploration for and production of energy resources should be provided for in this plan by opening or maintaining access to areas which may contain these resources. Areas identified as having energy and mineral potential should influence other resource decisions. Access to these areas should be limited only by the minimum legal standards established for environmental protection. In areas where conflicting resource values may outweigh mineral values, the BLM should identify what minimum environmental protection is necessary to meet the plan objective for these resources.

On Page 4-78 of the DEIS, Environmental Consequences, the BLM indicates that Preferred Alternative F would result in a 20.4% decrease in lands available for oil and gas leasing with standard stipulations, a decrease of 7.4% in lands with seasonal occupancy restrictions, and an increase of 141% in lands with a no surface occupancy (NSO) stipulation. Such changes are extreme in light of the fact that the BLM has also chosen to recommend designation of wilderness in an area considered to have oil and gas potential. Given that the Lemhi RA generally experiences high potential for oil and gas, we question the rationale for such an increase in surface restrictions. The Preferred Alternative does not appear to have taken this potential into consideration. In fact, Alternative F is one of the most restrictive in terms of mineral access. Even though the BLM

December 18, 1985

Mr. Jerry Wilfong
Lemhi Resource Area Manager
Bureau of Land Management

page two

states on Page 43 of the plan, Operating Procedures, that the authorized official may waive certain conditions should the situation warrant it, once a stipulation is in place it will be difficult to change.

The BLM further states that actually only 12,720 acres will be inaccessible to oil and gas exploration and production because companies can directionally drill the remaining acreage. This estimation is based upon current technology. While the current technology may allow for directional drilling in some cases, the BLM cannot have actually considered the substantial increases in cost nor the increased technical problems associated with directional drilling. There are no guarantees that a well drilled under normal circumstances will be successful, but the chances are significantly less when directional drilling is involved. Directional drilling is not the panacea many seem to think it is.

While we appreciate that the BLM has been specific in terms of restrictions and their associated impacts on oil and gas exploration and production activities, the documents lack specificity as to the rationale for these decisions. There is no evidence that the BLM has done a tradeoff analysis between surface and subsurface resources. When comparing the geologic potential and Alternative F maps, it is obvious that most of the NSO areas are located in areas considered valuable for oil and gas resources. But has the BLM considered the loss to local, state and national economies which will result from such severe restrictions on oil and gas activities? Industry has proven time and time again that its operations are compatible with sensitive resource values. There are many widely used methods available to mitigate adverse impacts to sensitive resources other than a no surface occupancy stipulation. It is interesting to note that timber access and cutting do not appear to be as restricted as oil and gas activities, yet timber activities generally have a more significant environmental impact.

In conclusion, it is our recommendation that the BLM modify the proposed action to include more of the goals in Alternative D, the Mineral Development Alternative. This would result in a more balanced, multiple-use-oriented resource management plan. While we would like to see Alternative D selected as the preferred alternative, we realize that it is not realistic. However, we believe that a combination of Alternatives D and F would provide a more equitable mix of resource goals and objectives.

Further, we believe it is essential for the BLM to calculate the lost or gained revenues which would result if the Preferred Alternative is adopted. By revenues, we mean filing fees, lease rentals and bonuses for unleased lands and

December 18, 1985

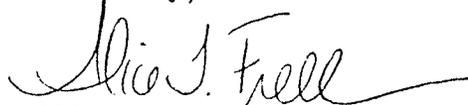
Mr. Jerry Wilfong
Lemhi Resource Area Manager
Bureau of Land Management

page three

leased lands not currently producing. If production is occurring the BLM should also include royalties and taxes which represent a return to local, state and federal governments. Additionally, this information should be provided for each of the management alternatives, thereby affording the public the opportunity to more fully evaluate the Bureau's alternatives and decisions.

Should you have any questions regarding our comments, please feel free to contact me. RMOGA would be happy to discuss these comments in further detail.

Sincerely,

A handwritten signature in cursive script that reads "Alice I. Frell". The signature is written in dark ink and has a long, sweeping horizontal line extending to the right.

Alice I. Frell
Public Lands Director

AIF:cw



Continental Divide Trail Society

P.O. BOX 30002

BETHESDA, MD. 20814

December 26, 1985

District Manager
Bureau of Land Management
Salmon District Office
P.O. Box 430
Salmon, Idaho 83467

Dear Sir:

Thank you for inviting us to review and comment on the Draft Resource Management Plan and Environmental Impact Statement for the Lemhi Resource Area - 1601(933). Our review relates solely to matters affecting the Continental Divide National Scenic Trail.

We are pleased that the CDNST is recognized as a Special Recreation Management Area and that the LRMP addresses management practices applicable to the Trail corridor. We concur with the need to write a recreation area management plan for the SRMA, as stated at page 2-44 of the EIS. We also agree with your emphasis upon visual quality goals for the SRMA.

The difficulty we have with the Plan is that it seems to assume that the location of the CDNST has already been selected. It has not. On the contrary, the comprehensive plan for the Trail must be issued by the Secretary of Agriculture and then the criteria must be applied, after consultation with interested parties, before any such a route selection decision can be made.

It is thus premature to identify the CDNST corridor. Notwithstanding this fact, we consider it entirely in order (1) to identify areas which BLM regards as likely locations for the Trail and (2) to apply appropriate interim management measures to assure that the qualities of those areas is protected until a formal designation of the route is made.

Accordingly, our first recommendation is that any references in the RMP to particular settings for the CDNST (especially the maps) should reflect the tentative nature of the route identification.

Our second recommendation is that the RMP clearly state that the formal designation will be preceded by a process, involving public participation, to select a route and prepare a recreation management area plan in accordance with the CDNST comprehensive management plan. Specific practices proposed in the present document should be reviewed on that occasion to assure compatibility with the comprehensive plan.

Turning to the map of the Preferred Alternative, let me comment in turn about each section proposed for management as part of the CDT SRMA.

December 26, 1985

T22N R23E. There is no good reason for this to be part of the SRMA, even on an interim basis. We don't envisage a route along the crest at this point. The Montana side seems much more likely. On the other hand, we have no objection to including it, on an interim basis, in a SRMA.

T18&19N R25E. The CDT quite obviously will hug the crest throughout this stretch. For interim purposes, the SRMA indicated on the map is acceptable. When the recreation area management plan is prepared, however, minor adjustment should be made to provide corridor protection on both sides of the actual treadway. See the 1980 Management Option Plan, Map 4, for details. (Why doesn't the hatching extend all the way to the south border of the township?)

T17N R27E. The same comment applies here. The SRMA is ok for interim purposes, but the Trail might better be moved down to the side of Whiskey Spring Creek when the RAMP is prepared, in which case the SRMA boundary would need to be adjusted.

T14N R28E. Again, there is no objection to including this tentatively in the SRMA. We anticipate, however, that option D2 (map 11 in the 1980 MOP) is less likely to be selected than route A-B4, which lies in Montana.

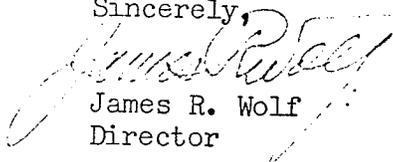
8-1 T13&14N R29E. The indicated SRMA reflects the location of route D2 of the 1980 MOP. As noted in our letter of August 30, 1983, we think route B4 may well prove to be a better choice over the long run, although it might require some new construction around the south side of Eighteenmile Peak. The pros and cons of all the alternatives can be weighed when the RAMP is developed. For interim purposes, however, we have no objection to showing the SRMA along the crest, provided that the Eighteenmile WSA is managed as wilderness. In any case, we question the following statement, at page G-13: "it is doubtful that the trail location would be in the WSA since an existing trail system exists nearby in Montana." We will keep an open mind on the subject and ask only that you do the same. A decision should be arrived at carefully, taking into account the factors identified in the comprehensive management plan.

For further information, we refer you to our publication, Guide to the Continental Divide Trail, v.2: Southern Montana and Idaho, which provides a detailed description of parts of the route.

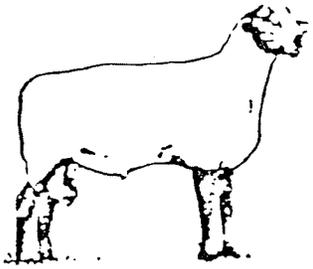
One specific management detail should be brought to your attention, though perhaps it should be dealt with in the context of the RAMP rather than here. Specifically, it would be desirable for the spring at the southern boundary of Section 24 of T17N R27E to be improved so as to provide a better water supply for stock and Trail users alike.

Please let us know if you wish any further information about the above.

Sincerely,



James R. Wolf
Director

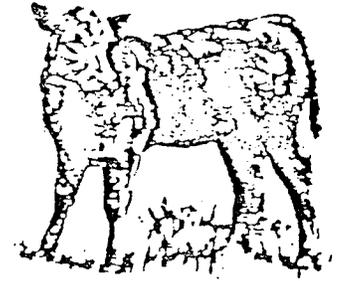


Lemhi Livestock &
Wool Marketing Ass'n., Inc.

206 Courthouse Drive

Phone 756-2824

SALMON, IDAHO 83467



January 10, 1986

District Manager
Bureau of Land Management
Salmon District Office
P.O. Box 430
Salmon, Idaho 83467

Dear Sir,

After studying the information presented in the Lemhi Resource Plan, the directors of this association would like to go on record as favoring an additional alternative. We feel that there is already sufficient wilderness in the county and that the deer and elk depredation problems are great enough to effectively prohibit any increase in wildlife populations. We are not convinced that there are any range problems severe enough to warrant the 20% number reduction proposed in your preferred plan.

For these reasons, we favor an alternative with the wildlife section from Alternative A; the minerals and lands section from Alternative G; and a new range section. The range section should provide: 1) An AMP on every allotment; 2) initial stocking level at current use; 3) about 25,000 acres of sagebrush control; 4) about 4000 acres of crested wheatgrass seedings; 5) as many springs developed as feasible consistent with the AMP's to be developed; and 6) minimum pipeline and fence construction to meet AMP objectives.

Thank you for inviting comment.

Sincerely,

Lamar Cockrell
President



COMMITTEE FOR IDAHO'S HIGH DESERT

P.O. BOX 463 BOISE, IDAHO 83701

January 13, 1986

Jerry Wilfong.
Lemhi Resource Area Manager
Box 430
Salmon Idaho 83467

Dear Sir:

Thank you for the opportunity to comment on the Lemhi R.M.P. It is a nicely put together document. We appreciate its high cartographic quality, and the breakdowns of grazing allotments by area within and without wilderness study areas.

We first wish to generally discuss the various alternatives. Alternatives B, D, and E would have unacceptable adverse impacts on wildlife, soils, water quality, fisheries, riparian habitat, and in the case of B, on vegetation.

Alternative C has many attractive qualities. It's major increases in wildlife populations, riparian quality, range vegetation quality, fisheries, and its adoption of the full WSA all fit very well with our membership's goals. We cannot, however, accept its impacts on the local economy. Continuing declining demand for beef is hurting the livestock industry as it is. We do strongly support Alternative C's call for the full 24,000 acre wilderness and for improved riparian quality.

We generally support Alternative F, your proposed alternative, but with several changes. Our comments follow.

We support wilderness recommendation for all 24,922 acres of the Eighteenmile WSA--plus the 640 acres in the State of Idaho's Section 36, T14N, R28E (acquired by exchange). With this addition, we feel you can have a highly manageable wilderness boundary. This area would provide additional safe habitat for bighorn sheep, as well as protect elk winter range, elk breeding area, and deer winter range. Plus, it would protect wolf and raptor habitat. It also would provide additional wilderness protection to a stretch of the Continental Divide Trail. It would provide primitive non-motorized recreation in a larger percentage of the Resource Area. We believe the GEM study shows that there is no special mineral potential in the northern area worthy of excluding it from wilderness designation.

We support greater reductions in grazing in this specific area than your R.M.P. calls for. The Eighteenmile Creek way should serve as the major access corridor to the wilderness area for families, the elderly, and the infirm. It travels through lands which are presently in very poor condition due to

10-1 overgrazing. Some of the best potential campsites which could
serve as base camps for day hikes up canyons to the Continental
Divide, are in poor condition and may be getting worse! The
10-2 general comments in your Chamberlain Creek allotment discussion
in Appendix B-4 (page B-55), do not seem to go far enough to
ensure a high-quality recreation experience in Eighteenmile
Creek. Nor does the very minor (3%) long-term grazing reduction
from actual use seem adequate. We support a minimum 50%
reduction in grazing along Eighteenmile Creek. We do not support
distributing this livestock use outside the creek corridor: the
away-from-the-creek areas should be maintained in the same good
condition they are in now. We urge you to move this intensive
livestock use out of the WSA.

These steps are not urged simply because we support wilderness for the area; they are urged because this is the Resource Area's only area of non-motorized semi-primitive primitive and primitive recreation opportunity. Foot and horseback travellers are much more aware of grazing impacts (i.e. cowpies and heavily utilized range), than are ORV users. They deserve a less heavily grazed area to walk through on this 459,000-acre Resource Area.

We feel your discussion of noxious weeds is deficient. The conclusion of paragraph one on page 3-13 should be changed to read: "Future efforts will involve using any biological or mechanical control methods available before developing any local control programs that would allow for use of herbicides where necessary. Areawide control programs using herbicides are the least desirable step, and would only be used if more acceptable measures were unavailable or proven ineffective."

We are unclear over exactly which steps result in such a great increase in elk in Alternative C. Is it the reductions in livestock grazing, or the additional 4300 acres of timber set aside for elk thermal and security cover? Also, is this extra land in timber that can be utilized by the Salmon mill, or must this type of timber be sent over to Montana? If this is lodgepole, and if this reserved timber acreage would significantly help elk, then we support additional timber reserve over Alternative F's recommendation.

Again, thank you for the opportunity to comment on your plan.



Sheldon Bluestein
Secretary



THE WILDERNESS SOCIETY

NORTHERN ROCKIES REGION

January 21, 1986

Ken Walker, District Manager
Salmon District - BLM
PO Box 430
Salmon, Idaho 83467

Re: Lemhi RMP/DEIS

The Wilderness Society appreciates this opportunity to comment on the Lemhi plan and supporting data and analysis. We believe that the direction indicated by the plan is by-and-large good, however we do not believe that it will allow these public resources to fully recover from past activities that have caused resource degradation.

Although a viable population of gray wolf does not now exist, the habitat potential is there and multiple sitings indicate wolf presence. Without the full wilderness recommendation we support, we do not believe this species will be provided for as required by the Threatened and Endangered Species Act. Likewise, we do not believe that adequate justifications for perpetuation of fair and poor range condition or full protection for riparian zones were presented.

Wilderness

We support the plan recommendation for protecting 14,796 acres of the Eighteenmile WSA as wilderness, but it is not enough. The WSA values include outstanding opportunities for solitude, and unconfined, primitive recreation. It is adjacent to the Italian Peaks, a magnificent area of public land administered by the Forest Service. We do not agree with your rationale for determining non-suitability for the remaining portion of the WSA because of adjacent National Forest failure to recommend wilderness for the contiguous forest that the remaining portion of the WSA not be recommended for wilderness as well is insufficient. Ways to deal with the management difficulties you mentioned were not addressed, and recent uses have not degraded the area beyond wilderness qualifications. Indeed, you mention that the jeep trails that do exist would return to a natural

11-1

state very rapidly simply by lack of use. We support wilderness designation of lands adjacent to the Continental Divide Trail as a permanent enhancement to the recreation value of the trail. The historic significance of this trail the the future importance of it justify protection of a natural buffer. We support a wilderness recommendation of all the 24,922 acres of Eighteenmile WSA and the State of Idaho's Section 36, T14N, R28E.

The full wilderness recommendation we support would provide protection for elk, bighorn sheep, and deer winter range as well as assure protection for gray wolf and bald eagle. Without the expanded recommendation we do not believe that these two threatened & endangered species' habitat will be maintained.

Fisheries and Water Quality

Improving habitat on only 3.00 miles of McDevitt Creek is an insufficient goal resource area wide. Improving water quality on only 2.25 miles on Sevenmile Creek is likewise far too low a mileage goal when so much of the nearly 30 miles of fishable creeks are in good to poor condition and are threatened. Maintaining 94.7 miles of stream in its present condition is too low a standard.

Water quality continues to be threatened by the failure of reforestation efforts. The plan states that this failure is in great part due to the impacts of grazing in recently harvested sites, yet gives no definitive resolution to this problem. The plan should specifically address the timber management program in relationship to reforestation and watershed degradation.

Riparian Zones

Although we commend the plan for proposing affirmation action in regard to some riparian zones, we cannot support the goal of maintaining an overall static trend in 94.7 miles. Since the majority of riparian zones in the resource area are typically dominated by highly erosive soils, greater attention should be given to season and degree of grazing activity.

Grazing

11-2

Livestock production does not outrank wildlife, fisheries, recreation, watershed and biological diversity in the multiple uses of this land. No longer can this area be managed as a predominantly range production resource. We commend the plan for its proposals to reduce livestock grazing when it causes degradation to the environment, but believe the plan should go further. Range condition should not be allowed to sink below a good condition, reseeding in the case of fire or range management should never be structured so that wildlife forage is sacrificed for livestock production forage. Such low long-range grazing reductions will not, in our view, improve range and riparian conditions from current poor conditions found throughout the RA but especially along Eighteenmile and Chamberlin Creeks. A long-range reduction in these two areas should approach 50%.

Although community stability for the livestock industry is an important consideration, the public's obligation to assure that industry is profitable at its current size does not extend to the destruction of other valuable resources. This is especially true when the economic value of domestic livestock production involves huge public subsidy compared to the rising positive economic values of wildlife, fisheries, water quality and recreation. Specifically, the plan must assure that the range condition, especially in the lower elevation, will show an improvement in trend from the current fair and poor condition and no degradation to the resources I just mentioned. A reasonable balance must be found where the grazing level can be maintained without destroying the ability of the environment to continue producing these other resources.

The plan does not present to the public a realistic picture of grazing economics for the area. What is the real net gain or loss to the public for managing the area for livestock at the expense of wildlife, fisheries, water and recreation.

Thank you for this opportunity to comment.

Sincerely,


Jane Leeson
Regional Assistant



HEATHER SMITH THOMAS
BOX 215
SALMON, IDAHO 83467
(208) 756-2841

November 29, 1985

District Manager
Salmon District BLM Office
P.O. Box 430
Salmon, Idaho 83467

Dear Ken:

Here are our comments on the draft EIS, which my husband and I read with great concern. As permittees, with our ranching future dependent upon use of the range, your EIS and plans for the range will greatly affect us. We feel that we have worked together with BLM very well during the last 30 years to manage our allotment and we want to continue to work with BLM. We want to cooperate in any way we can to ensure good, healthy rangeland. We care deeply about the land and its future, for it is our future, too, and that of our children. All we're asking is that BLM be accountable and responsive so that we can work together.

The draft EIS is a big disappointment. BLM employees have done a good job in trying to soften the blow when talking individually with frustrated ranchers like us who have been asking questions about the EIS. But if we are to believe their "assurances", then why was the draft EIS written the way it was? Just to satisfy the NRDC court order and the environmentalists who forced it? Regardless of the local repercussions? Or is BLM being a little two-faced--printing a document like this but trying to tell the ranchers that it doesn't really mean what it says. The document, in all its negativisms against livestock, is what the public reads. If BLM truly wants to work with the ranchers to improve the range, the agency should write a more responsible EIS, and write it in more realistic and less negative terms--instead of this type of arbitrary and anti-livestock document that only serves as a slap in the face to the rancher. It looks like a breach of faith on the part of BLM, and a sell-out to interests who want cows off the range.

We ranchers want to do our part in responsible range management. Yet BLM puts forth this kind of document which alienates the rancher and makes him antagonistic. No matter what you tell us verbally, the EIS stands glaringly for all to see, and we can only assume that this is what the BLM wants the public to read. Therefore we feel we have no choice but to take issue with the parts we feel are unrealistic, unfair, and irresponsible, and to try to explain our reasons for doing so, in hopes of fostering better communication and understanding somewhere on down the line--as we continue to try to work together with BLM as mutual managers of our range. We're not taking issue with the local BLM employees as much as we are with the BLM's goals and actions as an agency. And this is our major frustration; perhaps the agency can not be responsive to the ranchers. Yet still, we must try to communicate.

Best wishes,

Heather Thomas

The whole thrust of the portions of the EIS dealing with grazing seem to be to protect other uses from grazing. By contrast, there is never any attempt to protect grazing from possible disruption by other uses. In the BLM's "plan", grazing is the use doing most of the "giving". For instance, restrictions on mining, energy and minerals extraction "are designed to protect wildlife habitat, recreational values, wilderness values and cultural resources" (page 1-2). But not to protect grazing. If grassland or water sources for livestock were affected or cut off by mining or energy development, so what? The same with timber and wood products restrictions. The EIS states (page 1-3) that "efforts to protect recreation and wilderness values and to protect or enhance elk winter range could result in some suitable forest lands and woodlands being unavailable for harvest." But it doesn't matter if grazing or livestock use patterns of an area are severely disrupted by timber harvest. And under "impacts to livestock grazing" there is no mention of possible adverse impacts from increased recreation, timber harvest, wilderness designation, mineral extraction, etc. Grazing seems to be the barely tolerated "poor relation" among the public land uses, kicked aside whenever anyone can come up with some other use for the land. Livestock grazing seems to have a low priority, as well as being blamed for decline in wildlife habitat, destruction of riparian areas, damage to soil and watershed. If there's any kind of problem out there, livestock must be to blame!

Secondly, BLM's main emphasis in this EIS is on wildlife. The BLM's attitude is perhaps summarized in the statement on page 12: "Hunting and fishing are extremely important to the local economy. Wildlife populations can be threatened when habitat is used for livestock grazing, timber harvesting or other uses."

1-5-56



NUCLEAR FUELS and GOLDEN PLEASURE, INC.

CARROLL W. WELLS
PHONE 756-3305

BOX 1232
SALMON, IDAHO 83467

District Manager
Bureau of Land Management
Salmon District Office
P.O. B. 430
Salmon, Idaho 83467

Dear Sir,

My father and I wish to share our concerns
to your proposed Lemhi Management Plan

We think there should be more wilderness
in Lemhi County, Idaho and we think there
should be open access to the mountains
etc., not being fenced or gated shut.

We believe in multiple use of our environment.
We have lived in Lemhi County, Idaho most of
our lives as did our forefathers and we
wish to continue to live here and to be able
to utilize the natural resources in the
County ~~and~~ not having the natural resources
locked up by the government.

Sincerely yours,
Carroll & Pete Wells

January 9, 1986

District Manager
Bureau of Land Management
Salmon, Idaho 83467

Dear Sir:

As citizens of Lemhi Valley for the past 40-years we are concerned about how our public lands are being managed.

We have reviewed the District plan and find that we have the following comments:

Lets first address the issue of Eighteen Mile Wilderness Study Area. We do not want any more wilderness in the state. We feel that public land should be used so they best serve all peoples.

We do not feel that the lands can support much more big game nor can the ranchers absorb any more cuts in cattle rights. This has to be decided on an individual basis with everyone working toward range improvements. It appears to us that when big game animals invade ranchers haystacks for feed due to incorrect Fish and Game measured stocking levels, that Fish and Game should be the agency supplementing big game winter feeding. We believe intensive and consistent seeding would benefit ranchers and big game animals as well.

We feel timber that meets criteria for sustained yield should be offered for sale. Closing roads after logging is a beneficial practice and these roads do not need to be first class.

We believe that designated Culteral Areas and irreplaceable historical areas should be greatly protected as it seems many citizens cannot resist intentional or unintentional vandalism.

We would like to see cautious management used for roads or motorized vehicles. Most BLM areas will not support intensive motorized use of their lands. We would like to see the Scenic and historic trails managed intersly as they are not replaceable.

We would like to see affected riparian habitat areas managed to maintain good watershed base, but grazed by cattle. We don't know what system would be best for this. Perhaps more water troughs and salt licks away from streams and an intensive seeding program of applicable grasses and forage undertaken in these areas. We believe that the fees for cattle Allm's should return to on-the-ground improvements of each allotment.

Page 2

We believe that good management is management that uses, maintains
and improves land used by all the people.

Thank you.

Mr. and Mrs. Kenneth E. Hyde

Kenneth E. Hyde

District Manager
BLM
Box 430
Salmon, Idaho 83467

Dear Sir,

After a lengthy consideration of the Lemhi Resource Management Plan we find that we cannot support the plan for a number of reasons.

1. The overall theme of the plan is too oriented toward wilderness, wildlife and recreation. These are indeed resources, but they do not contribute greatly to the economic base of the local area.

2. A great deal of emphasis is placed on fencing riparian areas. I believe the BLM sets fence specification for these areas that allow for the easy passage of wild game. This type of fence will not turn cattle, so what is the purpose of going to this expense.

15-1 | 3. The sawtimber acreage under plan F would be reduced as compared to plan A. Saw timber acres are too valuable to be replaced by wilderness in Lemhi County.

4. At this time the Idaho Dept. Of Fish & Game has finally decided they may have too many deer and elk for the amount of winter range in the Lemhi River foothills. This be the case, there is no reason to provide for a larger big game herd in the area.

15-2 | 5. There is absolutely no need for any expansion of wilderness in the Salmon BLM District. Lemhi County has given its full share to wilderness. A great many people are at present using the 18 Mile Study Area for non-wilderness recreation. The area does not show signs of abuse. Why throw these people out.

6. Other alternatives are also quite lopsided and extreme. The most sensible of them all is alternative A. It is least expensive to administer, and most fair to all concerned. We can support alternative A.

89

Sincerely,
C. L. Gilpin
Deloris Gilpin
515 Hope Av.
Salmon, Idaho 83467

QUINTON SNOOK

GENERAL CONTRACTOR

ROUTE 1—BOX 49 PHONE 756-2787

SALMON, IDAHO 83467

January 10, 1986

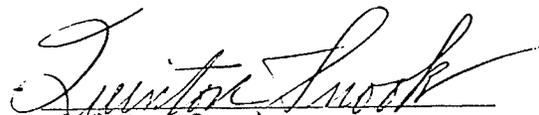
District Manager
Bureau of Land Management
Box 30
Salmon, Idaho 83467

Dear Ken,

We, Quinton Snook and Lois Snook, favor the Alternative G in the proposed Lemhi Resource Management Plan. We also favor no further wilderness in Lemhi County at this time; we feel that the River of No Return Wilderness in the county is more that adequate.

We would like to emphasis the need for good management in regard to livestock grazing. The Haynes Creek Association has a workable rotation grazing plan. However, weed and sagebrush control and re-seeding programs that have previously been practiced could greatly improve the present and future grazing.

Sincerely,


Quinton Snook


Lois Snook

Lenhi, Idaho
January 9, 1986

District Manager
BLM, Box 430
Salmon, Idaho 83467

Gentlemen:

We support Alternative A with two amendments. 1. Acting preference continue to be the stocking level and 2. AMP's be developed with necessary improvements to operate under the principles of multiple use and sustained yield.

We need no more designated wilderness areas. There are thousands of acres of public land that by its very nature will always be beyond the use of man.

The forage on public lands has no value by itself, but when it is utilized by domestic cattle and sheep it is turned into valuable protein food so necessary in the world today.

The stockmen, in cooperation with the BLM and the Forest Service, are and have been the only ones developing and maintaining these lands so that they may continue to yield their bounty. Their improvement of seeding, water development, etc. have also benefited the wild life.

I, therefore, do not see the reasoning in the trend to cut the rancher's production in favor of wildlife and recreation. Without the free grazing on private lands by wildlife, their existence would be greatly jeopardized; likewise, they would also be threatened without the range developments now maintained by the stockmen.

Very truly yours,

Sam P. McKinney

Sam P. McKinney

10 January 85

Dear Jerry:

We would like to endorse the BLM's choice of Alternative F as the best proposed management plan for the Lemhi Resource Area.

The attitude that cattle cause no more damage than wild-life to riparian habitat is ridiculous. Since our property adjoins the Haynes Creek grazing allotment, we can verify that a large number of cattle live right in the creek bottom in late summer. By September the stream-bank soil is compacted, the remaining vegetation is trampled into the mud, the creek water is foul with manure, and the resulting erosion looks nearly as bad as spring runoff.

If certain people's comparison of cattle and woodland bison is to be valid, then logically all the fences should be removed and the cattle allowed to roam as freely as the bison did, thus minimizing concentrated impact.

We surely don't object to cattle use of public lands; however, cattle are only one aspect of a multiple use plan. Thus, we favor a reduction of AUM's, fencing of vulnerable streams, and preservation of the proposed wilderness at Eighteenmile.

Thank you.

Sincerely,

Mike Monroe
Alexia Cochran

Mike Monroe
Alexia Cochran
Rt. 1, Box 48 B-1
Salmon, Idaho 83467

Bureau of Land Management
Salmon District Office
Salmon, Idaho 83467

To Who it may concern:

Dear Sirs:

In regard to you management
plan for the Salmon area. I
would like to see all area
put in a multiple use category.
We need to use this land for
the betterment of the people
who live here and want to
live here. We need no more
wilderness. Thank You.

Sincerely Yours,
Walter J. McConaghy
R#1 Box 37
Salmon, Idaho 83467

J. ALLEN JENSEN
Canyon Road
Route 7, Box 166
Idaho Falls, ID 83401

10 January 1086

District Manager
Salmon District Office
U.S. Bureau of Land Management
P.O. Box 430,
Salmon, Idaho 83467

RE: Draft Resource Management Plan and
Environmental Impact Statement
Lemhi Resource Area

Dear Sir;

I have read and studied the above-named document at some length. Having served for about four years on the Citizens Advisory Committee for the Northwest Region of the National Park Service under then Secretary Rogers C. B. Morton, I had considerable exposure to Environmental Impact Statements and Planning and Development Programs generated by the Park Service and developed an appreciation for the time spent on research, study, writing and rewriting that goes into the drafting and publication of these works. I would like to compliment you and your staff on the painstaking work that has gone into the production of this document.

With your having developed several alternative plans, I can understand that your preferred alternative, Plan "F", would be a difficult one to give up. However, I urge that you adopt Alternative Plan "A" and continue on with the course which the BLM has pursued so successfully in the past.

It would be unfair of me not to disclose that I have close family ties to one of the livestock operators in Lemhi County and that I have grave concerns about the future of the livestock industry here even under present conditions, let alone under the impact of a new and different operating plan.

The economic reality at this period in time is that every day brings increased difficulties in coping with the various forces that, intentionally or unintentionally, conspire to put an end to successful livestock operations in Lemhi County and, for that matter, in the rest of the state.

These same difficulties are being felt by your department. You are called upon to do more and more, yet the odds are that because of the horrendous problems facing our national budget you will have fewer and fewer resources with which to do what it is you are being called upon to do.

Under these circumstances it would appear that a continuation of the programs you are doing so well at the present time would be a prudent course to follow. And this would seem to indicate that Alternative "A" ought to be the preferred alternative.

It should be obvious that it is in the livestock operator's best interest to see that range land is consistently improved and that the quality of his stock is improved. It would also be obvious that the goals of the BLM and the Livestock Industry are inseparably bound together. A healthy livestock industry makes it easier for the BLM to do its job. Divergence from time-tested procedures cannot help but put additional burdens on the livestock industry and, ultimately, on the Bureau.

The adoption of Alternative "A" would represent a continuation of the multiple use program which has served this area well. Recreation, conservation, mining (where economical), timbering (where economical) and ranching (where economical) have all been successfully pursued under the existing policies and practices. Why change something that is working reasonably well for all concerned?

To some there is an objection to Alternative "A" because it seems to favor the livestock industry. Of course it does. And rightly so! Of all the many users of the land the livestock operator is virtually the only one who has made a capital investment in the public lands. Save for the timber and mining industries, the only other users pay nothing for the use of the land or the streams. They use the resources for their recreational enjoyment, which is all to the good, but as we have pointed out--there isn't all that much joy in the livestock industry these days. So what, if the Livestock Industry would be favored by Alternative "A". Its damn near the only thing that does!

This brings us, of course, to one group, the wilderness advocates, who cry that what this state needs is more and more and more wilderness to meet the needs of those who will never avail themselves of a wilderness experience.

20-1 | Your own discussion of the Eighteenmile Wilderness Study Area (WSA) reveals a present use that is barely susceptible of tabulation and your prediction is that in the foreseeable future such use is not likely to increase. If that is the case it is difficult to see that you have made a case for a recommendation to Congress that the WSA should be included in the nation's wilderness system. Where is the necessity--or even the desirability?

From your study it is apparent that even if nothing is done to implement wilderness designation, the wilderness experience in this particular area can be achieved in the foreseeable future by anyone who desires to make the trip. The gray wolf, if there is one, will never be disturbed.

Sincerely,

95

2



January 13, 1986

District Manager
Bureau of Land Management
P.O. Box 430
Salmon, Idaho 83467

Gentlemen:

After a very thorough review of the Lemhi Resource Management Plan, I am sorry to say, but I feel all professionalism was left out when figuring range production stocking levels.

After all the soil samples taken, prior range analysis, on the ground observation, stocking levels were set at an acre figure per AUM arbitrarily across the whole resource area. The nine acre figure proposed by the BLM compares to 3.48 acres on the Forest Service, or thirty-nine (39) percent of the carrying capacity of the Forest. A lot of this range joins the Forest and would therefore have a similar carrying capacity, while some of the really low ranges would have a lower carrying capacity.

Also, your proposed increases in wildlife numbers seem to already be admitted in error, therefore, that should be re-adjusted allowing a further increase in domestic AUM's. (Reference B-11)

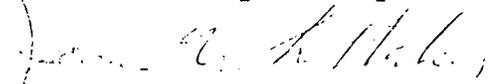
WE CANNOT AFFORD ANYMORE WILDERNESS!!!!

It seems unreal in this day and age of technological advances that we cannot increase our carrying capacities on the range without any adverse impacts to other resource values. We are continually increasing our carrying capacity on private ground.

MOST RANGE IMPROVEMENTS ARE ALSO BENEFICIAL TO WILDLIFE!

I prefer the original plan, Alternative A.

Yours for improved public lands,


James Whittaker
Box 240
Two Dot : Ranch
Leadore, Idaho 83464

Salmon, Idaho
Jan 6, 1986

RE Lemhi Reservoir Mgt. Plan

To action it May Cooness;

Dear Sirs; Mr. Kenneth Walker;

In continuance to the B.L.M.

The problem seems to keep returning, never settled, and under constant study. Also under the regular program followed by the B.L.M. will return every five years. I'm talking about letter writing, reading the same study junk over and over and never to arrive at a goal.

In the 1970's Congress passed regulations to have studies on public lands to satisfy small handfuls of people that seem to think their organization needs to be recognized. These affluent people with their noise were heard, which brought them a place to holler. Now there are more of these organized groups of which some have only (5-10) people and right or wrong ~~the~~ demand to be heard. The last one I've heard of is a small group protecting buffalo from hunting in Montana north of the Yellowstone Park. This group puts emphasis on survival of Buffalo. These buffalo seem to want to wander beyond the limits of the park and in turn crowd to enlarge the park ecosystem. Personally I have no resentment toward buffalo as long as the animals be needed.

management. But why should they be able to run over private people and private property. I know I went thru this with a neighbor who held what he considered domesticated buffalo. This group is for the survival of buffalo.

This group gives no consideration for the millions of dollars spent for the elimination of Brucellosis, and no consideration for those livestock people near the park whose herds of livestock may in turn be quarantined in case of disease spread. These situations could happen here.

Why should we worry or be concerned? Brucellosis is a contractable disease to humans. Much time and money have been devoted to eradication of this disease. Now how can this small group (about 7) be able to be so vocal and create a sore spot to keep the disease alive?

How many of you people read the article in the Western Livestock Reporter of a gentleman giving a report to the Sierra Club. The name name, Allan Savory, he is of the Center for Holistic Resource Management. He says range lands can deteriorate more rapidly when no cattle are present, than they do from overgrazing. He also indicates livestock under management can be a most powerful tool in regenerating wildlife habitat. He gives instances

of 300 years of overgrazing by Indians and not a desert in form. He also gives instance of no grazing (20 - 30 - 50) year ~~periods~~ ^{periods} the result being signs where the lands are showing signs to revert to desert. He had slides to show the trends noted above to verify his studies. He recommends a happy medium where livestock being moved around, or by rotation can create desired effects to stimulate plant life.

I personally feel that in my lifetime that most areas and ranges that have had a chance under proper use and reduced status, have shown a definite response. I have felt that we needed range management be whatever department BLM or Forest supervision. Also if these 2 departments were consolidated, it would help to lower the expense and in effect could help the national debt.

We do not need to have the expertise of people dedicated to long hair or the professional world like mad or the bar to show range management expertise

There are people on the ground with ground floor experience and under the guidance of range trained people to farm phase of allocation and managing of livestock to utilize these renewable

resources.

In my lifetime I have seen areas which were ideal for the wildlife while in the presence of livestock and livestock people. Be degenerated by the roads put out there whether it be for ranger management or T.V. towers or just plain pole gitters.

There are plain and common things we need, like lumber for homes and food to eat and roads for production as needed. After that these roads should be closed and if not they are a definite detriment. There are assets put here for our use, but why should we create people pollution with garbage and waste to be seen forever. To close these roads would ultimately leave the areas logged or grazed in a more pristine atmosphere and hold the lands in a more natural state. So why do we need any more Wilderness?

The timber people are not trying to run the public away or ruin anybody's environment. They treat public land with care. They know they need to be able to come back again. They are not opposed to Multiple Use.

The livestock people are not trying to hog the situation. Most of them are there this year and know the land needs respect so the renewable

resources to their needs will be there in the future. They are also there for Multiple Use.

I am not a poor loser I am a true Conservationist. My standards now and in the past have been to leave it better than it was when I came. So far this is a true and verifiable statement. My theories are not based on emotions therefore let us leave what is working in a working shape. Whatever alternative we select A or B it F does not matter, let's find the alternative that is nearest to what we have and fine tune the product. It will be better for everybody.

Thanks for your time
Yours truly
Ernest Edwards

January 10, 1986

District Manager
Bureau of Land Management
Salmon District Office
P.O. Box 430
Salmon, ID 83467

Dear Sir:

This is written pursuant to the provisions of a letter from the Associate State Director of the Bureau of Land Management, dated October 1, 1985, soliciting written comments by January 13, 1986. We hope you will consider this response timely.

The undersigned are citizens of Bonneville^{and Jefferson} County^{us} who have substantial ties to many of the ranchers and residents of Lemhi County. We are aware of the proposals in the Draft Resource Management Plan and Environmental Impact Statement for the Lemhi Resource Area and make the following comments:

1. The economic stability of Lemhi County depends upon continued management of the public lands in a multiple use mode-- as they have been in the past.

2. The existing use, as outlined in your Alternative "A" seems to us to be the best plan for the future. The Bureau certainly has the authority to monitor, plan, develop and supervise the lands under its jurisdiction in a continuing progressive manner, which, in partnership with the users thereof has resulted in slow and steady improvement of the total resources of the county. Why make a change?

23
-1 3. The concept of multiple use--the greatest good for the greatest number of people-- would seem to rule out the proposed plan for Wilderness in the Lemhi Resource Area. We believe we have enough wilderness in this state. Wilderness, by definition, excludes multiple use as it has traditionally been known. By your own studies the present use of the proposed Wilderness Area is such that anyone who wishes to have a wilderness experience can have it now and will be able to have it for years to come. If the system works, don't fix it.

This country urgently needs to cut the costs of government. It is probable that expenditures by the Bureau of Land Management will be curtailed, budget increases will come under tougher scrutiny and it is likely that operating funds will be kept to a minimum. Given this economic environment it would seem prudent to continue operations much as they have been in past years. A new program would scarcely meet the economic strictures you are likely to encounter. A new plan that cannot be implemented is worse than a continuation of past practices that have worked tolerably well.

It is inevitable that departures from traditional practices would place new economic burdens on the livestock and timbering industries. You are aware of the economic stress that these industries have been subjected to in recent years. In the struggle for continued existence we think additional burdens and uncertainties are not warranted and certainly not justified.

Respectfully submitted,

Gene E. Burnett Lemmon, Ia. #17 Box 163 Idaho Falls, Ida.
Quinn H Hammond 150 Fieldstream Lane Idaho Falls, Id 83401
Lester H Hammond 150 Fieldstream Lane Idaho Falls, ⁸³⁴⁰¹ Ida
Marion E Jensen Rt. 7 Box 166 Idaho Falls, Id. 83401
Mary G. Beasley Rt. 7 Box 167 Idaho Falls, Id. 83401
John W. Beasley Rt. 7, Box 167 Idaho Falls, Ida.
Ann M. Jensen Rt #17 Box 173 Idaho Falls 83401 83401
John & Christy Hoff Rt. 7 Box 171 Idaho Falls, Ida. 83401
David C. Jensen Rt 7 Box 172 Idaho Falls, Ida. 83401
Ross L. Sharp 428 N 7th W Rigby, Id. 83442
Judson Menzies 2613 Mill Rd Idaho Falls, Ida 83402
Gary Larson 706 Box 392A Idaho Falls, Idaho 83401
Micheal A. Reed 153 WHITTIER ST. IDAHO FALLS, ID. 83401
Katie Clayton 590 Riverview ¹⁰³ Idaho Falls, Id. 83402
Vicky M Clayton 590 Riverview Idaho Falls, Id 83402

Mountain K Ranch
Rt. 1, Box 24
Salmon, Idaho 83467
January, 11, 1986

District Manager
Bureau of Land Management
Salmon District Office
P. O. Box 430
Salmon, Idaho 83467

Dear sirs;

Please consider this letter as a reply and comment to your Lemhi Resource Management Plan. Briefly, there are several items that need to be brought out and discussed furthur. Most of the following comments have already been discussed at the public meetings and so are concerns of myself and others in the county and thus demand your review and furthur consideration.

ITEM 1

A major concern is the possibility of delaying spring turn-out dates on the lower, poorer ranges. It has been noted that these ephemeral ranges lose their forage resource very rapidly in the spring especially during hot, dry years. Delaying turn-out dates would only lessen, and waste, the availability of this resource. An alternative would be to develop AMP's for each allotment as soon as possible and implement rest rotations and deferred grazing plans.

ITEM 2

It appears that wildlife numbers are at, or exceed, the winter ranges carrying capacity to support the present numbers of ungulant wildlife. Since winter range is the limiting factor for wildlife support it makes no sense to increase their numbers if they have to be fed in the winter. There has also been a considerable amount of depredation problems on private land, especially these last three tough winters.

ITEM 3

There should not be standardized fence construction for all situations. Different situations require different fence configurations to be able to adequately cope with differing wildlife and livestock problems.

ITEM 4

It is questionable how a stocking rate of 9 acres/AUM can be allocated across the entire Lemhi Resource Area when there are such diverse ranges and range conditions. In my own situation the present stocking rate runs from 9.3 to 27.5 ac./AUM and the higher rate encompasses the worst and the best of my range! It appears that the arbitrary figure of 9 ac./AUM needs a considerable amount of further study and documentation for its support.

ITEM 5

I don't have too many disagreements with your evaluation of our allotment; however, I do think that our range is in better condition, and improving, than the proposed cut in alternative F. would indicate. 1985 was an extremely dry year, however out of 53 cows run on the range there was only one open cow in the fall at preg. checking time. These cows were bred on the lower portion of our allotment from May 1 to July 1. This is the ephemeral portion of our range that was very dry this past year. We ran our range cows, and the cows which stayed at home, exactly the same way in 1985 as we did in 1984 (an excellent range year). The weaning weights of the steers was exactly the same both years. The condition of the cows when they came off the range was comparable both years. The same cows were on the range both years. The point I am making is that the best way to determine a ranges condition is by weighing calves and looking at the cows condition as she comes off the range, not by counting grass stems!

CONCLUSION

I feel that the above items need to be re-evaluated before the final Resource Management Plan is selected. These items are concerns of a large number of people in the affected area.

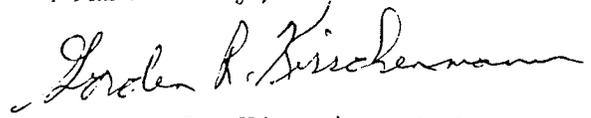
Each allotment should be evaluated individually and an AMP implemented as soon as possible on each allotment.

There is enough wilderness already in Idaho. More would only lock out additional people not able to handle a wilderness situation.

I am for a multiple use concept of the natural resources put here for our use and care. One segment of the population should not have preference over another except that jobs and base economies should be protected and enhanced.

My suggestion is the implementation of Alternative A and writing AMP's for each allotment as soon as possible.

Yours truly,

A handwritten signature in cursive script that reads "Gordon R. Kirschenmann". The signature is written in dark ink and is positioned above the printed name.

Gorden R. Kirschenmann

Carmen, Ida, 83462
Box 12 Jan 8 - 1986

Dear B.L.M.

District manager

In your alternatives its hard for us to say which one is right, but I tried to understand them. The one we feel is near to what we want is F.

We are against any further wilderness. We also feel that cows are more important then building up the Elk ~~herds~~ or deer population.

In the past things have been good why mess up a good thing I know you have to comply with the over head and do some thing but please don't mess up the farmer's we only have such a little bit of ground to farm in Ida anyway the rest is government owned.

We better watch out because I do feel that Sierra Club & others is trying get to control of our water for ~~now~~ Nevada or Calif. there's got to be something behind all this control of our River of no return.

Fencing isn't the answer to prevent Live stock from riparian ground.

I do feel you need to get better
count on the cattle going out on the range
alternative A you said you would sell land
to people I think that's good. Then people will
pay taxes on the land and it would help
out. When the government has it we don't
see any taxes. We need more ground in
private ownership.

thank you

Mrs Matt Yakovos
Matt Yakovos

Mr. Wilfong

In reveuing the proposals for range and forest mangement plans that have been brought out for reveiw the most workable ones are alternatives A and alternative 12 as proposed by the Forest Service and Bureu of Land Manage ment.

There needs to be a greater emphasis put on protecting existing State water rights and individual rights to such watery
These water rights should be protected over Wilderness and the Wild and Scenic River Acts.

There should be a contious on going concern for the pèople that are affected by any decission affecting the resoures of the people in the Salmon National Forest and also Salmon Bureau of Land Management.

The wild game should be considered along with the domestic animals that use the range and forest because both wild game and domestic animals generate revenue within the community and county which helps brings in in revenue and keeps the community in the black.

How much actual tax bace and disposable imcome is generated for actual use by the community and State Government and not by one agency.

In considering on going costs against timber, mineral and water, the wage, tax bace and the well being of the citizens needs to be addressed.
Anover-all effect upon not only the people of the community, those on down the line whose livelyhoods is affected, along with the taxes directly or indirectly paid by these poeple need to be figured in when determining the actual bentifits of both alternatives.

No more Wilderness should be allocated within the Salmnn Bureau of Land Management, nor Salmon National Forest.

Each of the areas should be evaluated for there multiple use concept.

Roads should be kept to a minium and consideration shuold be given to whether to close or leave them open with considertiongiven for the valuse and effects of them over all.

The cost of running a Wilderness is too prohibitive to consider and the people it displaces must be a prim consideration.

Yours for multiple use thru good management.

Sincerely

A condered Ranger in Lerhi County
Pat Mc Connaghy

P.S.

Therefore I would like to see our Representatives and Sentors solve this Wilderness probem once and for all.

8552 Baron Dr
Knoxville TN 37923

January 9, 1986

District Manager
Bureau of Land Management
Salmon District Office
P.O. Box 430
Salmon ID 83467

Dear Sirs,

Thank you for the opportunity to review the Lemhi proposed RMP and draft EIS. The very considerable effort which your staff put into preparing this document is evident. I appreciate your efforts. I have few suggestions, comments and questions which follow.

I have to question your decision not to analyze impacts on endangered species. While it is true that endangered species are protected by BLM, and critical habitats will be preserved, the Plan can improve or destroy occupied or unoccupied habitat. Therefore the impact of the alternatives on existing and possibly reintroduced populations of endangered species should be analyzed.

Utility and right-of-way corridors should also have been discussed. While the EIS argues well that there is little or no need for such corridors on public land, the areas where such corridors or developments are permitted should be described and planned along with the other resources in the management area.

The proposed plan is too weak in its protection for wildlife habitat, riparian areas and primitive and semi-primitive recreation opportunities. Allowing only a small fraction of the area's AUMs to wildlife seems unreasonable. Justification should be given for such a low emphasis on wildlife.

The proposed plan will lead to improvement on a small number of poor condition riparian areas. In my opinion, no riparian area should be left in any less than good condition. Justification should be given for not upgrading all riparian areas to good condition.

27-1 All primitive and semi-primitive recreation opportunities in the resource area are in Eighteen Mile USA. I do not see any justification for abandoning any of the little remaining semi-primitive recreation opportunities in the area. The rationale given for excluding the northern portion of the USA from the wilderness recommendation is inadequate. While the BLM land in the northern part of the USA is rather narrow, the Italian Peak USA which is adjacent and the nearby Beaverhead NF lands would give a depth and manageability to the BLM lands. There is no question that the northern part of this USA and the adjacent ~~Forest~~ National Forest lands are suitable, available and manageable as wilderness. A better justification is needed if you want to exclude the northern part of this USA.

Thank you again for this opportunity to comment.
I hope the comments are helpful. I appreciate
all the hard work the planning team has put into this
document.

Please send me a copy of the final plan and
~~ETS~~. Thank you.

Sincerely,

Lance McCall

Lance McCall

Rt. 1, Box 167C
Worland, Wyoming 82401
January 6, 1986

District Manager
Salmon District Office
P.O. Box 430
Salmon, Idaho 83467

Dear Sir:

Enclosed are comments on the Lemhi Resource Management Plan and EIS. I will apologize at the beginning of this note for comments I make that are cross referenced or further clarified elsewhere in the document. Without the intimate knowledge of the entire document organization the preparers have, it is difficult at best to review a document of this complexity without error.

Comments - Draft Resource Management Plan

Page 3

Paragraph 3 You note agriculture as the economic base for the local economy. As noted on pages 3-31, 3-32 through 3-39 in the EIS, Agriculture contributes only 5-10% to the County total income - this is hardly the economic base. Agriculture approximately equals The Federal government contribution not even considering state and local government contributions. This paragraph is misleading and elevates Agriculture to a false importance to the local economy easily overshadowed by recreation and government contributions. By your own analysis, farm/agriculture is a very weak base for the local economy whereas government and recreation are stronger. A statement to this extent should be included.

Page #5 Wilderness Suitability

Background

28-1

When do the oil and gas leases expire - 1987? These are post FLPMA leases and subject to WSA restrictions at present. You have the choice not to reissue these leases. Was your oil and gas EA amended to consider wilderness study areas and will leases be reissued in '87.00

28-2

percent

How significant is the timber (commercial) resource in ~~the~~ of allowable cut potential and contribution to that industry in view of the long hauling distance.

I find the "long term commitment to management objectives" in these types of documents rapidly erodes with ever changing personnel that refuse to "hold the line" and end up compromising the resource because that's easier. No one said this is easy. I hope this is not the case in the Lemhi RA.

Thank you for allowing me to comment and for considering these comments. Document review burnout is upon me. Thanks.

Sincerely yours

Jeff Dvorak

District Manager
B L M
Box 430
Salmon, Id. 83467

Gentlemen:

I support alternative "A" with these items to be considered.

With no reduction in present A.U.M. levels and active improvement and maintenance being done so our level can be returned to a level of 63,898 A.U.M.'s and more as range is improved.

There should be no increase of present level of wildlife until the Fish and Game shows they can manage what they have now. They must take the winter feeding pressure off the rancher and land owner.

Riparian fencing should be done only as a last resort after all other alternatives have been exhausted.

No wilderness should be allocated within the B.L.M. boundaries.

You must remember that the domestic animals that use the B.L.M. are the real revenue generating agent within the community. A healthy livestock industry will keep the community and schools in the black.

When making range improvements the BLM should consult and take the advice from long time residents that know the land and how water runs especially in the question of springs development. A college degree does not make one an expert in any certain field.

Yours for better public lands through
Multiple use

Sincerely

Dan & Eileen French

Rt. 1

Box 94

Salmon, Id

83467

Fran Tonsmeire
Box 871
Salmon, Idaho 83467

District Manager
BLM
Salmon, Idaho

Dear District Manager:

I am writing in support of your preferred alternative F for the Lemhi Resource Plan. It seems to favor the long term impact on the range and wildlife instead of the increased short term benefits.

I am particularly concerned with the prime elk and deer winter range. Since adverse impacts on the timber are only slight I don't think we should risk disturbing the game habitat and fisheries with additional road, in crucial areas. Displacement of elk and deer due to roaded areas or lack of range feed seems only to cause problems in other areas. Example: elk raiding ranch hay stacks. Also with insignificant long term impact to livestock grazing, I feel the benefits (range vegetation, wildlife habitat, fisheries and recreation) far outweigh the adverse impacts.

I do support your wilderness recommendations as a means of permanently protectly vital areas.

In closing, I feel your direction in either holding or improving range conditions is essential in the long range planning. To me, short sighted management is mismanagement.

Thank you for your efforts in preparing this plan and good luck.

Sincerely,



Fran Tonsmeire

January 12, 1986

District Manager
BLM
Box 430
Salmon, Idaho 83467

Dear Sir:

I support Alternative A with some exceptions. I feel that the present stocking level should be maintained unless it can be proven that this level is causing severe damage to the range. I also feel the the BLM lands should be managed for Multiple Use.

Some general comments about Alternative F are as follows: I am against any further Wilderness designation for Public Lands in Idaho. I feel that the character of an area can be maintained thru management rather than designation. Use of road closures and rehabilitation are examples of maintaining the area's values.

I feel that most of the wildlife winter range is now at its carrying capacity. This is especially true on the Lemhi drainage. It would make little difference if all of the cattle were off the range, because during a heavy snow year the game would move to private land and cause great problems. There is no mention of the amount of big game that uses private land already on a year around basis. If more are pushed onto private land the land owners will have to eliminate some or go out of business.

The Federal Government already owns to much land and should never be allowed to aquire private land.

I don't feel that there is a need to fence riparian areas, I think the majority of the damage is caused by high water and cloudbursts rather than livestock. Instream flow is not a matter for the Federal Government, it is a state right.

Sincerely

Bruce L. Mulkey
Bruce L. Mulkey

JoAn E. Wood
DISTRICT 20
CLARK, CUSTER, JEFFERSON
AND LEMHI COUNTIES

HOME ADDRESS
ROUTE 1, BOX 21
RIGBY, IDAHO 83442
PHONE (208) 745-7846



COMMITTEES
EDUCATION
RESOURCES AND CONSERVATION
HEALTH AND WELFARE

House of Representatives State of Idaho

District Manager
B. L. M.
Box 430
Salmon, Idaho 83467

Dear Sirs:

After talking to many of my constituents, I will convey their feelings about the Lemhi Resource Management Plan.

They feel and I agree, that we cannot support the Preferred Alternative. There are many good reasons why we cannot support this Alternative, some of them are,

- 1- It is economically unsound and unfair to expect ranchers to pay for the costs of improving wildlife and recreation.
- 2- We are against any increase in the amount of Wildlife in our State, especially in our Lemhi Resource area. It is not economically sound for our area either. We just cannot afford this alternative. It increases 1000% the cost of the existing alternative A.
- 3- We already have more game population than we have winter feed for. It is not a question of private stock going on to public land but wildlife coming onto private ground in many areas to intrude into private haystacks etc.
- 4- Preferred Alternative unjustifiably attempts to cut livestock grazing for the benefit of wildlife and recreation.

JoAn E. Wood
DISTRICT 20
CLARK, CUSTER, JEFFERSON
AND LEMHI COUNTIES

HOME ADDRESS
ROUTE 1, BOX 21
RIGBY, IDAHO 83442
PHONE (208) 745-7846



COMMITTEES
EDUCATION
RESOURCES AND CONSERVATION
HEALTH AND WELFARE

House of Representatives State of Idaho

5. Forage allocation for wildlife is not quantifiable with any degree of accuracy at this time.
6. Fence standards need modified to meet each situation.
7. Most of the problems caused by early spring grazing could be handled with an allotment management plan where the units could be rotated or in some instances reseeded.
8. Instream flow on Big Timber Creek should not be a B.L.M. consideration.
9. Alternative A takes land out of government ownership without adding any more. The preferred alternative is merely going to exchange lands. We think government should stop acquiring land, with few exceptions.
10. The preferred alternative F emphasizes recreation and aesthetic values too much over commodity production on public lands.
11. Fencing to prevent livestock grazing is not the answer to deteriorating riparian habitats.

We would like to support and recommend to you Alternative A with two amendments. We think there should be an amendment recommending active preference continue to be the stocking level. Also AMP's be developed with necessary improvements to operate under the principles of Multiple Use and Sustained Yield.

Sincerely yours, Rep. JoAn E. Wood Dist. 30

DANE H. WATKINS
DISTRICT 33
BONNEVILLE, JEFFERSON, MADISON,
FREMONT, CLARK, BUTTE, CUSTER,
LEMHI AND TETON COUNTIES

HOME ADDRESS
2242 SOUTH BOULEVARD
IDAHO FALLS, IDAHO 83402
RESIDENCE (208) 522-4855
OFFICE (208) 523-0800



COMMITTEES
CHAIRMAN
LOCAL GOVERNMENT AND TAXATION
FINANCE

Idaho State Senate

CAPITOL BUILDING
BOISE

January 9, 1986

District Manager
BLM
Box 430
Salmon, Idaho 83467

RE: Salmon National Forest Plan

Gentlemen:

We support Alternative A with two amendments. 1. Active preference continue to be the stocking level. 2. AMP'S be developed with necessary improvements to operate under the principles of "multiple use" and "sustained yield".

We cannot support the 'Preferred Alternative' for the following reasons:

1. We simply cannot afford it. It costs in excess of one thousand (1000%) percent of the existing Alternative A.
2. We are against any further wilderness.
3. We feel it is economically unsound and unfair to expect ranchers to pay for the costs of improving wildlife and recreation.
4. It unjustifiably attempts to cut livestock grazing for the benefit of wildlife and recreation.
5. Our present game population is more than we have winter feed for.
6. Forage allocation for wildlife is not quantifiable with any degree of accuracy at this time.
7. Fence standards need modified to meet each situation.
8. Most of the problems caused by early spring grazing could be handled with an allotment management plan where the units could be rotated or in some instances reseeded.
9. Instream flow on Big Timber Creek should not be a BLM consideration.

10. Alternative A takes land out of government ownership without adding anymore. The preferred alternative is merely going to exchange lands. We think government should stop acquiring land, with few exceptions.
11. The preferred Alternative F emphasizes recreation and aesthetic values too much over commodity production on public lands.
12. Fencing to prevent livestock grazing is not the answer to deteriorating riparian habits.

Sincerely,



Dane Watkins
Senator

DW/pc

Turner Ranch
Star Route 1, Box 55
North Fork, ID 83466
11 Jan 1986

District Manager
BLM
Box 430
Salmon, ID 83467

Gentleman:

I have reviewed your various Alternative Management plans.

Principles of Multiple Use and Optimum Sustained Yield are vital to those in Lemhi County.

Your Preferred Alternative^F appears to be a well thought out compromise for most of the various interests evolved. With downward budget trends it appears that funds will not be available to adequately implement Alternate F.

Cattlemen of the Lemhi Valley area favor alternative A, considering implementation costs in relation to economic returns.

Wilderness :

34-1

I do not favor any more. The present restrictions against the use of chain saws to maintain needed trails and facilities hampers foot and horse travel plus causing increased Management costs for needed maintenance. Vital economic returns from Wilderness do not appear to justify more Wilderness.

Wild Life: An important economic resource.

Those who harvest this resource should carry the expense of good management practices and requirements so as to have adequate game, winter feed etc.

Lack of effective Predator control has created economic losses in Game and for those raising Sheep.

Roads into Game areas should have limited vehicle access, be closed during Hunting seasons and or during critical periods. Access at other periods for fire wood and timber will contribute to the overall economy.

Other Recreational uses:

Management should not be a burden to other users of the land.

Fencing:

Past & Future considerations should not be a burden to the Cattle industry.

The poor economic condition of Lemhi County requires that Plans and Alternatives of Land Management consider cost factors in relation to maximum returns to be realized over the planned time period.

123

Sincerely,
Winfield S. & Betty J. Turner

Winfield & Betty Turner

January 13, 1986

District Manager
BLM
Box 430
Salmon, Idaho 83467

Gentlemen:

I am against Preferred Alternative F for the following reasons:

1. We don't need any more wilderness. It is a waste of land, that only a few get any benefit from. The wilderness that we have now is fine and enough. Wilderness does not help support the local community. It is for a few outsiders that don't have to make their living here.
2. The nine acres per A.U.M. is unfair to the ranchers. You say you are going to make an allotment by allotment study to set grazing adjustments. But if we accept this nine acres per A.U.M. it leaves the door open for the B.L.M. to do whatever you want to. You may be sincere in what you say, but whoever replaces you may not.
3. We don't need any more wildlife. As I understand this is one of the main reasons for having the nine acre per A.U.M. , is to make more room for wildlife. It is unfair to cut the livestock grazing to support more wildlife, which the winter range can't support. This has been proven this winter that the wildlife population is at its maximum. If I understood correctly, Tom Parker of the Fish & Game admitted this in the meeting of January 7, 1986. Having more wildlife would also put more hardship on the farmers and ranchers with wildlife moving in on the haystacks in winter and fields in the early spring grubbing the new growth of grass and alfalfa. Elk are carriers of bangs, which can infect cattle, like any other disease it is more prevalent when populations get overcrowded. Wildlife also doesn't support the local community as much as cattle do.
4. The fence standards need modified to meet each situation. My experience with 3-wire fences is that there is no advantage over 4-wire fences concerning wildlife. The first two years we put in a 3-wire fence, it was torn up just as much as 4-wire fences are the first 2 years. Through the years, I have noticed that it takes a couple years for wildlife to get accustomed to a new fence. 4-wires don't hinder wildlife any more than 3-wires. The 3-wire fences don't hold cattle as well as 4-wires; causing more riding & fence repair for the rancher.

5. Cattle deteriorating riparian habitats has not been proven. Why go through the expense & inconvenience of fencing streams because of some bias studies. Some studies have shown that cattle may even benefit riparian habitat. Why penalize the ranchers for something that is not proven.

I support Alternative A with two amendments.

1. Active preference continue to be the stocking level.
2. AMP's be developed with necessary improvements to operate under the principles of multiple use and sustained yield.

Sincerely,



Rodger Swanson

Route 1 Box 45

Salmon, Idaho 83467

District Manager

Bureau of Land Management

P. O. Box 430

Salmon, ID 83467

Gentlemen:

We support Alternative A with two amendments: (1) Active preference continue to be the stocking level; (2) AMPs be developed with necessary improvements to operate under the principles of MULTIPLE USE and SUSTAINED YIELD.

We cannot support the (Preferred Alternative) for the following reasons:

1. We simply cannot afford it. It costs in excess of one thousand (1,000%) of the existing Alternative A.
2. We are against any further wilderness.
3. We feel it is economically unsound and unfair to expect ranchers to pay for the costs of improving wildlife and recreation.
4. It unjustifiably attempts to cut livestock grazing for the benefit of wildlife and recreation.
5. Our present game population is more than we have winter feed for.
6. Forage allocation for wildlife is not quantifiable with any degree of accuracy at this time.
7. Fence standards need modified to meet each situation.

8. Most of the problems caused by early spring grazing could be handled with an allotment management plan where the units could be rotated or, in some instances, reseeded.
9. Instream flow on Big Timber Creek should not be a BLM consideration.
10. Alternative A takes land out of government ownership without adding any more. The Preferred Alternative is merely going to exchange lands. We think government should stop acquiring land, with few exceptions.
11. The Preferred Alternative F emphasizes recreation and aesthetic values too much over commodity production on public lands.
12. Fencing to prevent livestock grazing is not the answer to deteriorating riparian habitats.

Yours for better public lands,

Name and Address

*0-2-1
In the Name of Better Public Lands
The Honorable Harold E. Bailey, Salmon, Idaho 83467*

Name and address
R. Smith, Jundoy, Idaho

Name and address
*C. Louise Calkins
Lemhi, Idaho*

Yours for better public lands,
Herbert Miller
Hubert and Lorraine Miller
HC 61 Box 175
Salmon, Idaho 83467

Thank you,
Mark and Melissa McKinney

Mark and Melissa McKinney
Box 17
Lemhi, Idaho 83465

Name and address
D. E. Bradley

Name and address
D. E. Bradley

Yester Cook

Yours for better public lands,
Mrs. Jacqueline Z. Beach
Name and address
Box 1207
Salmon, Idaho 83467
Russell Beach
Box 1207
Salmon, Idaho 83467

Yours for better public lands,
Edgar S. Edwards
Cathy Cooper

grazing is not the answer to deteriorating
Public Lands
Yours for better public lands,
Roy Bird
Box 27
Kendrick, Idaho

Yours for better public lands,
Dean & Ethel Shiner
Name and address
P.O. Box 35 Leader Idaho
Lauritt Martonen
Lien Martonen
617 N. St. Charles
Salmon, Id. 83467

Yours for better public lands,
Walter L. Jones
Retired Rancher Logger
Name and address
Merron C. Jones
E.C. Bolander
Yours for better public lands,

Yours for better public lands,
Edward Charles Anderson
305 WATER ST.
Salmon Idaho 83467
Name and address
Dave McJannet
Royden C. Hoff

Yours for better public lands,
Bibi Allen
V. Don Olson,
Rt #1 Box 11A
Salmon Idaho 83467
Yours for better public lands,
Ben O'Neal
Adrienne Mills
Michael Cooper

Latherine L. Swartz
Mrs. Faith Swartz
P.O. Box 8077 Salmon Idaho 83467

Judy Skinner
Rt 1 Box 27
Salmon, Id. 83467

Jim Skinner
Rte 1 Box 27
Salmon, Idaho 83467

Sincerely yours for a better public lands

~~Name and address~~
Mona L. Armstrong
Rt 1 Box 213
Salmon, Id 83467

Yours for better public lands,

Beverly Cockrell

Yours for better public lands,

~~Name and address~~
Virginia Perry
Rt 1 Box 155a
Salmon Idaho 83467

Sincerely,

Wanda J. Torgler

1103 Fulton
Salmon, Idaho 83467

Yours for better public lands,

Charles Porter

Sincerely,

Martin Capps

Yours for better public lands,

~~Name and address~~
Barbara Bayley
Ternoy, Idaho

public lands,

Joe Cayworth
Box 3
Ternoy ID 83465

Yours for better public lands,

Oppe Porter

Sincerely,

Ann D. Torgler

1103 Fulton
Salmon, Idaho 83467

Yours for better public lands,

Richard J. Tyler
Name and address

Garrett Burt
Lida... - Star Route
Bladen

Yours for better public lands,

Custine M. Andrews
Name and address

Suzie Cochrell
305 Water St.
Salmon, Idaho

Yours for better public lands,

Kent Smith
Name and address

Lynn Hulet
Box 21 Tendoy

Yours for better public lands,

Edelhard Bagley
Name and address
Box 33 Tendoy

Varva Baker
Id. 83468
Box 11

Yours for better public lands,

Terrell M. Kaffing
Name and address

Jerry Fortner
Linda...
Tadon, Id.

Yours for better public lands,

Mrs Carol R. Spuehler

Kerry Madsen

Yours for better public lands,

Awarda Cochrell

Yours for better public lands,

Yours for better public lands,

Don R. Anderson

Shirley Spuehler
P.O. Box 934
Salmon, Idaho

Yours for better public lands,

Walter B. White
Name and address

Russell & Debby Brown
P.O. Box 1707
Salmon, Idaho 83467

Yours for better public lands,

Name and address

208-756-3872

Jahm A. Neal
Box 135-Carmen, Id.
83462

Yours for better public lands,

Yours for better public lands,

Charles Shunk
Leadore, Idaho

Sincerely yours for a better public lands

Jack D. Armstrong

Jack D. Armstrong
Rt 1 Box 213
Salmon, Id 83467

Yours for better public lands,

William J. Sen
Rt. Box 111
Salmon Idaho
83467

Yours for better public lands,

Boyd E. Andrews
Lorna C. Andrews

Yours for better public lands,

Viola M. O'Neal
HC-62 Box 2230
May, Idaho 83253

Yours for better public lands,

John & Jane M. Connolly

Yours for better public lands,

Ted & O'Neal

Yours for better public lands,

Paul M. O'Neal
HC 62 Box 2230
May Id. 83253

Yours for better public lands,

Daniel Cockrell

Yours for better public lands,

Raymond Cockrell

Yours for better public lands,

Wanda Cockrell

Yours for better public lands,

Ray C. Andrews

Donnell L. Aldous

Yours for true Multiple Use and sustained yield,

James Whittaker

James Whittaker
Chairman
Citizens for Multiple Use
Box 240
Leadore, Idaho 83464

Yours truly,
Tex J. Kauer Pres.
Melba M. Kauer, Sec.
McFarland Livestock Co. Inc

er public lands,
Rosalie Hawley
SS *506 9th ST. S*
Salmon, Id. 83467

Yours for better public lands,

Opie Crandall
Name and address
1204 19th
Leadore Idaho 83462

Yours for better public lands,

Louise M. Stahl
Name and address
1704 Main
SALMON, ID 83467

Yours for better public lands,

Nicholas Olson

lands,
Wesley E. H...
506 9th Street
Salmon Idaho
83467

Yours for better public lands,

Charles Deon
Leadore, Idaho

Yours for better public lands,

Charles Deon
Leadore, Idaho

Yours for better public lands,

Michael J. Kohl
Frank J. Kohl

Yours for better public lands,

Ileta Hoffman

Yours for better public lands,

Roy Hoffman
Sharon Hoffman

and address
Lee Street, Box 164
Leadore Idaho 83464

Yours for better public lands,

Judrey M. Smith

Name and address *Box 16
Lendoy, Idaho 83465*

Yours for better public lands,

Name and address

Yours for better public lands,

Marlene Tobias, Box 13 Lemhi Ida.

Name and address *83465*

Name and address

*Marye Sage
Rt 1, Box 69 Salmon Id 83467*

Yours for better public lands,

Name and address

Name and address

*Bill Johnson
Box 35, Montpelier, Id. 83466*

Name and address

*Jim Baker
Fresa, Idaho
HEADQUARTERS, ID*

er public lands,

ESS

*Clarence L. Jones
Retired Rancher, Logger
Marion C. Jones*

Thank you for your time,
Yours for better public lands,

*John Cranney
Cathy Cranney*

ck grazing is my one

er better public lands,

d address

*Serga Perry
Rt 1 Box 199A
Salmon Idaho*

Mr. and Mrs. John Cranney
204 Larson Street
Salmon, Idaho 83467

Randy Capps

Yours for better public lands,

Edward Schaller
Marjorie Schaller

Name and address

313 Augusta Ave
Salmon, Id 83467

Yours for better public lands,

Samuel L. Lutes

Name and address

Leadon, Idaho 83467

Yours for better public lands,

Name and address

101 Box 94
Minnie Clark Salmon, Idaho 83467

Yours for better public lands,

Name and address

Bill Clark
101 Box 94 Salmon, Idaho 83467

Name and address

Yours for better public lands,

Bill Sager

P. T. 1 BOX 69
Salmon, Idaho 83467

Edward J. Jones
Box 38
Merley Idaho

Yours

Name

Yours for better public lands,

Kathryn Bird

Name and address

4941 Whitaker
Crabtree, Idaho 83202

Yours for better public lands,

Velma Finney

Name and address

Yours for better public lands,

Yours for better lands,
Lucinda P. Walker

Name and address

Yours for better public lands,

Laura Edwards

P.O. Box 299

Salmon, Idaho 83467

Yours for better public lands

Maie C E Edwards

P.O. Box 299

Salmon, Idaho 83467

Yours for a better world

Blair Fauer

Thank you
Arnold Tobias
Lemhi ID 83465

June S. Playfair

Box 38

Lemhi, Idaho 83465

Ernerett Lusk

Box 202

Salmon Ida 83467

Yours for better public lands,

Carole J. Jucker

Name and address

Lemhi, ID

Sincerely

Mike + Donna Kessler
Star Route Box 3
LEADORE, Idaho 83464

Yours for better public lands,

Paul Fisher

Rt. 1 Box 88

Salmon

Gertrude N. Hadd

201 Lena St.

Salmon, Ida. 83467

Bureau of Land Management
Salmon District
P. O. Box 430
Salmon, ID 83467

Gentlemen:

We support the existing situation or Alternative A in the Lemhi Resource Management Plan.

We do not want and cannot afford any more lands tied up in wilderness in Lemhi County.

Sincerely,

~~Jerry Hitesman~~
1510 Main Street
Salmon, Id
83467

JERRY HITESMAN

Nancy Bector
POB 744

Salmon, ID 83467

STAN HITESMAN

1510 MAIN STREET

SALMON, ID

83467

~~St. John~~

1
Harold, T. Waters
Box 6
Lodore Idaho
83464

Quora King
PO-152
Carmen Id -

Melody Kauer
Lemhi, Idaho

Yucky Smith

Rt. 1 Box 139E

Salmon, Id. 83467

Sincerely,

Marlene Waters

Mike Crowley

Rt #1 Box 131A

Salmon

Mike Crowley

Reed L. Butikofer
Reed L. Butikofer

B. R. Butikofer
Brett R. Butikofer

Helen Butikofer
Helen Butikofer

Suzanne Butikofer
Suzanne Butikofer

Mrs. Duglas Jones
Box 28
Perma, Id. 83465

Sincerely
Helen J. Kosler
Thomas J. Kosler

L.R. Mowbr
P.O. Box 983
Salmon, Idaho 83467

Robert Mowbr
1119 Huff, 93 N.
Salmon, Id.

W. Joe Smith
Rt Box 139 C
Salmon Idaho 83467

William R. Pector
Box 744
Salmon, ID. 83467

Gene J. Ottorello
Rt 1 Box 28A
Salmon, Idaho. 83467

Sincerely,
Bruce Edlefsen
Helen Edlefsen
Star Route
Leadore, Id. 83464

Curt V. Harper
1800 Main
Salmon Id. 83467

SINCERELY
Kathie Curtis

STATE OF IDAHO

PUBLIC HEARING RE)
LEMHI RESOURCE MANAGEMENT) TRANSCRIPT OF HEARING
DRAFT PLAN)
_____)

Hearing before HAROLD RAMSBACHER, Hearing Officer,
at the Salmon Public Library, Salmon, Idaho, November 20,
1985, at 7:30 p.m.

ORIGINAL



139
DICK TELFORD REPORTING SERVICE
460 "B" Street
P.O. Box 195
Idaho Falls, Idaho 83402
208-529-5491



A P P E A R A N C E S

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Hearing Officer: HAROLD RAMSBACHER
Bureau of Land Management
Salmon District Office
Highway 93 South
P. O. Box 430
Salmon, Idaho 83467

BLM Representatives: JERRY WILFONG, Lemhi Area
Manager
HARLEY METZ, Team Leader
DAVE WOLF, District Wilderness
Coordinator

Speakers: JACK F. ELLIS
HEATHER THOMAS
JAMES WHITTAKER

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I N D E X

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SPEAKERS:

Jack Ellis -----	8
Heather Thomas -----	11
James Whittaker -----	19

1 I would now like to explain the procedures that we
2 will follow tonight. Rebecca Myers, our court reporter,
3 will make a verbatim transcript of this hearing. All
4 presentations while we are in session will be reported by
5 the reporter to ensure a complete and accurate record.
6 Comments received tonight plus all previously received
7 statements and any comments or any future statements or
8 comments received through January 13, 1986, will be consider-
9 ed in the presentation of the proposed Resource Management
10 Plan and final Environmental Impact Statement. That plan
11 and EIS are scheduled to be released in May, 1986. A
12 decision on the plan and state director approval will be
13 made no sooner than thirty days after release of the final
14 EIS. That decision will have no commitments for the manage-
15 ment of the Wilderness Study Area other than to preserve
16 the existing characteristics pending Congressional consider-
17 ation and action.

18 In addition to the proposed Resource Management Plan
19 and final EIS, a separate Wilderness EIS and Wilderness
20 Study Report will be forwarded to the Secretary of Interior
21 and the President for their review and recommendations.
22 Ultimately, Congress will make the final decision as to
23 whether any areas will be designated wilderness. The
24 release date for that final Wilderness EIS has not yet been
25 scheduled.

1 Tonight's speakers will be called in the order in
2 which they were signed in at the reception table. There's
3 a ten-minute time limit for each presentation, and that
4 will apply even though you may represent more than one
5 party. Only one person may speak at a time, and no one will
6 be recognized to speak other than the person presenting the
7 statement. This is necessary so that the court reporter can
8 produce an accurate copy of tonight's proceedings. If any
9 speaker has an extra copy of a prepared statement, the
10 reporter will appreciate receiving it just before or just
11 after the presentation.

12 If you wish to give a supplemental statement and
13 you don't have time for the oral presentation, you can
14 submit it later in written form. As I mentioned earlier,
15 all your comments must be received in the Salmon District
16 Office by the close of business on January 13, 1986.

17 Later in the evening after all persons who have
18 requested to speak have finished and if time is available
19 I will consider requests for supplementary oral statements
20 or statements from those who did not sign up to speak at
21 the start of the hearing. These statements will also be
22 limited to ten minutes. There will be no interrogations of
23 speakers; however, BLM representatives are permitted to
24 ask questions of the speakers for clarification. In that
25 regard the BLM representatives are not required to respond

1 to statements made by the speakers. In other words, this
2 is not an open public meeting where BLM responds to questions
3 or comments from the floor. It is a hearing to record
4 your statements only. The district people have informed
5 me that they would be more than welcome to receive you at
6 the District Office and go over any of your concerns or clear
7 up any points that you may have at that time.

8 When you come to the podium, please give me your
9 name, address, and state whom you represent. If you wish
10 to submit additional written testimony, you may hand it to
11 the reporter, and it will be marked as an exhibit. We will
12 notify you when you have one minute remaining of your ten
13 minutes. I'll try to do that, but you might get the dong.
14 Being we only have a few people signed up, I would imagine
15 that after it dongs we can probably give you one minute
16 to finish up. We won't keep anybody up too late. So once
17 you hear the dong, then take about one minute to summarize.

18 One final announcement: this is a public meeting,
19 and I ask that you do not smoke. We will take a ten-minute
20 break during each hour, and if the hour happens to come
21 while somebody is speaking we'll wait until you're finished.
22 Are there any questions before we call on our first speaker?

23 (No response)

24 THE HEARING EXAMINER: If not, then our first
25 speaker will be Mr. Jack Ellis.

1 Also regarding wildlife, we may be near ungulate wildlife
2 populations which are sustainable given the limited amount
3 of winter range and the increasing wildlife deprivation
4 problem on the private lands within the resource area.

5 Perhaps we don't need to plan to handle many more ungulate
6 wildlife than current populations.

7 Another item requiring discussion is fencing and
8 fence construction standards. Public safety in some
9 instances requires more than three-wire fences, especially
10 along public highway rights of way. In other areas livestock
11 pressure because of topography will require substantial
12 fencing to assure some degree of control or to prohibit
13 excessive maintenance costs.

14 We agree with the bureau's contention that repetitive
15 early spring grazing can lead to reduced plant vigor and a
16 down trend in range condition; however, most of the
17 problems in the Lemhi Resource Area are caused by lack of
18 AMP's, which lead to improved grazing use, not turn-out
19 date per se. It needs to be recognized in the plan that a
20 lot of the early range is ephemeral; that is, the range
21 desiccates so rapidly that if it is not used early it is
22 not available. In addition, water availability is a problem
23 on many of the lower ranges. They can be used early when
24 precipitation and snow melt provide potholes and intermittent
25 streams. As this water is lost, the range is unavailable for

1 use.

2 The final item which requires clarification is the
3 arbitrary acre/AUM figure which is used as a starting point
4 for determining stocking rate. Range sites in the Lemhi
5 area vary from two to three acres/AUM to as much as forty
6 acres/AUM. It will require a good deal of monitoring and
7 further study to determine that a stocking level needs to
8 be reduced just because the allotment does not reach the
9 arbitrary nine acre/AUM figure used in this document.

10 The emphasis on riparian lands in this document is
11 warranted. There is no question that the riparian lands are
12 the most preferred habitat for many wildlife species and
13 are the most productive lands in most allotments. The
14 suggestion that all riparian problems are a result of poor
15 livestock grazing management is unwarranted. The work of
16 Larry Bryant in Oregon and observation in this area will
17 quickly demonstrate that accelerated stream bank erosion
18 attributable to livestock is almost immeasurable. Rapid
19 stream runoff and icing contribute a much greater magnitude
20 of bank erosion and stream bed sedimentation than any other
21 cause. We agree that grazing systems to provide some degree
22 or period of rest for riparian area will alleviate most
23 problems.

24 Again, citing the work of Bryant and co-workers,
25 fencing to prohibit livestock grazing is an almost unworkable

1 and eminently unsatisfactory solution to the problem.
2 Bryant found that riparian areas responded much more rapidly
3 to almost any grazing treatment except season-long use at
4 constant stocking rates than to exclusion of grazing.

5 THE HEARING OFFICER: I think I'm going to
6 dispense with this buzzer. You can probably hear it in
7 the back of the room ticking. Heather Thomas.

8 HEATHER THOMAS

9
10 MS. THOMAS: This is just a summary of a longer
11 written statement I'd like to send later. I can still send
12 one later, can't I?

13 THE HEARING OFFICER: You bet.

14 MS. THOMAS: My name is Heather Thomas, Box 215,
15 Salmon, Idaho. I'm representing myself.

16 This EIS is of great concern to ranchers who depend
17 on the range. Ever since the Taylor Grazing Act ranchers
18 have been working with the agency to improve their allot-
19 ments, and most ranges are in good shape today. Range
20 trend has definitely been upward.

21 UNIDENTIFIED SPEAKER: Excuse me, people in the
22 back can't hear you. Do we have a speaker system or any-
23 thing, or could we rearrange that?

24 (Brief recess)

25 THE HEARING OFFICER: Start over, please,

1 Heather.

2 MS. THOMAS: This EIS is of great concern to
3 ranchers who depend on the range. Ever since the Taylor
4 Grazing Act ranchers have been working with the agency to
5 improve their allotments, and most ranges are in good
6 shape today. Range trend has definitely been upward.

7 So we read the draft EIS with disbelief and frustra-
8 tion. It is written with a very negative view of grazing.
9 It looks at cattle as something damaging rather than bene-
10 ficial and natural. The main emphasis of the document
11 seems to be enhancement of wildlife habitat and populations
12 and the feeling that wildlife and livestock are basically
13 incompatible, which they are not.

14 Economic impacts addressed in the EIS don't adequately
15 reflect the adverse impact upon affected ranchers and sub-
16 sequently the community and county that would occur if
17 these ranchers have to take the proposed cuts. There are
18 some inaccurate conclusions regarding ecology, impacts of
19 livestock on wildlife, soil erosion, riparian areas. The
20 means used to determine proper stocking rates and proposed
21 cuts are questionable.

22 It's frustrating to the rancher to be confronted
23 with this huge document that so importantly affects his life
24 and be given only a few weeks to respond to it when BLM had
25 several years to do the EIS.

1 BLM employees get paid no matter how it turns out.
2 Most of them will move on; so it may not matter to them how
3 it turns out. It may not matter whether inventories and
4 decisions are correct, figures here, lines on a map there.
5 So what if a bunch of ranchers' future is at stake? If a
6 mistake is made or a vegetation site is poorly chosen or a
7 site write-up is left off the map by mistake, who cares?
8 The BLM employee gets paid all the same, but the rancher
9 sees the errors that make his range look worse than it
10 really is, the soil studies and vegetation write-ups that
11 may affect his whole future that were done in an afternoon
12 by a temporary employee who may have been in a hurry or
13 lost or unable to cover the whole range to get a truly
14 representative sampling, and he is totally frustrated.

15 All through the EIS it is assumed that grazing
16 causes decline in wildlife habitat and numbers, destruction
17 of riparian areas, damage to soil and watershed. I could
18 list twenty references, but this attitude is maybe summarized
19 by the statement on page twelve: hunting and fishing are
20 extremely important to the local economy. Wildlife popula-
21 tions can be threatened when habitat is used for livestock
22 grazing, timber harvest, or other uses.

23 BLM seems to think wildlife are more valuable than
24 livestock or timber or perhaps feels wildlife interests
25 have more political clout. This is sad because wildlife and

1 livestock are compatible and have been doing very well
2 together on our ranges with wildlife numbers greatly
3 increasing in recent years. Yet BLM assumes there is a
4 conflict and is proposing to reduce livestock to have even
5 more wildlife to satisfy the goals of Fish and Game for
6 increased game numbers even though many areas already have
7 such expanding populations they are encroaching on private
8 lands with elk getting into haystacks, deer and antelope
9 decimating hay crops, not because BLM habitat outside the
10 fence is poor but because the alfalfa inside the fence is
11 just too tempting.

12 Ranchers want good conditions for wildlife also,
13 but we're not sure we want as much expansion in numbers as
14 Fish and Game and BLM are shooting for, no pun intended.
15 The preferred alternative of BLM meets the Fish and Game
16 projected population goals for big game and isn't much
17 different from alternative C, which would maximize wildlife
18 and restrict other uses.

19 So BLM wants to increase wildlife and reduce livestock
20 even though the two are compatible and complimentary. Deer
21 and antelope eat more browse and forbs than grass. Cattle
22 keep elk range healthy by keeping down old rank growth.
23 Regrowth is always more palatable and nutritious. Grazing
24 was shown to greatly improve elk winter range in a study
25 in Oregon. Grazing also improves sage grouse habitat, as

1 shown by a two-year study in Nevada, and also benefits birds
2 like curlew, mountain plover, horned lark, to name a few,
3 that prefer short vegetation and nesting sites with maximum
4 visibility.

5 Cattle fill an important ecological niche left by
6 the buffalo. There are a number of wildlife species
7 dependent upon conditions created by large grazing herbi-
8 vores. We have to remember that buffalo grazed these
9 ranges for thousands of years and that native wildlife
10 coexist with bovine grazers very well.

11 Some people think that streams are delicate parts
12 of the environment and that in pristine conditions they were
13 never trampled or overgrazed. Not so. Buffalo had more
14 impact on stream banks than our cattle. They traveled in
15 much larger herds.

16 Most streams in North America have been impacted by
17 grazers for thousands of years. Yet fish survived. Stream
18 bank vegetation survived. Mother Nature has been compromis-
19 ing for a long time.

20 Hooved animals actually decrease stream bank erosion
21 by sloping the banks. Without this sloping effect you have
22 more undercut banks that are toppled into the stream during
23 high water, adding more silt all at once than is added during
24 the whole year from grazing impact. And when undercut banks
25 topple with the added force of spring runoff, they may take

1 trees and bushes with them impeding the channel, causing
2 more cutting and new channels, contributing more destruction
3 and erosion than if the banks had been sloped by cattle
4 and less vulnerable to undercutting. Natural erosion does
5 more damage than livestock, and riparian areas usually
6 bounce back faster than surrounding arid land when grazed
7 because of more rapid regrowth potential, more available
8 stored moisture.

9 The EIS acknowledges that grazing is important
10 economically, maintaining most of the livestock operations.
11 Yet the BLM proposes to cut many permits. BLM keeps trying
12 to assure us that these cuts won't be implemented without
13 further study and that after the cuts are made we would
14 eventually get the numbers back, but they said the same
15 thing in 1964. Improvements were made. The grass increased,
16 but livestock numbers were never restored. Now they
17 propose to cut us again giving the same old promises. But
18 why cut when ranges improved after the early cuts?

19 It's hard to convince BLM the range has improved
20 when they didn't do any monitoring or trend studies after
21 the last cuts to see how the range responded. BLM people
22 involved in those earlier actions are long gone. BLM has
23 no continuity, no consistency, keeps no promises. Other
24 uses come along that have to be considered. Other priorities
25 come to the front. Policies change.

1 That's why the rancher doesn't trust the BLM and is
2 reluctant to agree to a cut. Range managers come and go
3 while the rancher has to stay on the land, pick up the
4 pieces, and adjust to each new policy with no guarantee of
5 tomorrow. A new manager, a new policy, may make it all
6 different. We have no guarantee BLM will give our numbers
7 back if we give them up. They didn't before.

8 The EIS states that actual farm income in Lemhi
9 County declined fifteen percent since 1978 and that after
10 adjusting for inflation this decline was forty-two percent.
11 It's really hard to stay in business at that rate; yet
12 BLM proposes to cut most of our allotments. If reductions
13 jeopardize the ranchers' ability to continue, it has serious
14 economic repercussions for the whole county. If we manage
15 to stay in business, if we have to look for private pasture
16 to rent because our range numbers are cut, this would make
17 so much competition for the limited private pasture that
18 it would become higher priced and even the nonrange ranchers
19 would also be affected.

20 The EIS lists several alternatives, most of which
21 aren't entirely realistic. Alternative A, the existing
22 situation, seems the most realistic, least damaging to
23 current uses, and least costly to the taxpayer.

24 Alternative B maximizes livestock, but it portrays
25 such a grim picture of environmental consequences even with

1 the tremendous BLM expenditures for improvements that few
2 would choose it.

3 Alternative C maximizes wildlife and cuts livestock
4 numbers ridiculously low. There would be so much grass left
5 most years that we'd have a fire hazard.

6 Alternative D maximizes mineral development with a
7 doomsday picture for wildlife, watershed, and environment.

8 Alternative E maximizes timber but is claimed to be
9 detrimental to wildlife, cultural and wilderness values.

10 BLM seems to think timber management and elk are incompatible
11 even though elk seem to do well in logged, regrowth areas.

12 BLM's preferred alternative F claims to give no
13 special emphasis to any one resource and to have balanced
14 multiple use management. Yet BLM plans to increase game
15 populations almost as high as in C, same budget for
16 wildlife projects, increasing deer by three thousand head,
17 elk by two hundred, and antelope one hundred fifty. Project-
18 ed management costs for all alternatives except the existing
19 conditions are high. Highest is B at over two million
20 dollars. Next highest is BLM's preferred F at one million
21 seven hundred twenty-one thousand, but even with all these
22 costly improvements livestock will be cut. By contract the
23 existing management, alternative A, is costing only one
24 hundred forty-six thousand one hundred dollars.

25 In these days of trying to cut taxes and balance

1 budgets do we really want a more costly program when the
2 existing situation seems adequate with its improving range
3 conditions and expanding wildlife populations? Can we
4 afford a more expensive program that will have an adverse
5 effect on range users? Why not stick with the existing
6 situation with beneficial results at much less cost?

7 Let's continue to work on range problems and conflicts
8 on a case-by-case basis, which is really the only way you
9 can solve them, not with some blanket plan, make improvements
10 where needed instead of adopting a costly plan that looks
11 suspiciously like the dream plan of Fish and Game with
12 ranchers coming out on the short end.

13 One of the truest statements in the EIS is on page
14 three fourteen, quote, from a historical prospective general
15 range condition is probably the best it has been in about
16 the last one hundred years. I agree. Thank you.

17 I can give this to you if I can give a longer comment
18 later, too, is that all right?

19 THE HEARING OFFICER: Oh, yes. Jim Thompson.

20 MR. THOMPSON: I don't wish to make a statement
21 at this time.

22 THE HEARING OFFICER: Okay. James Whittaker.

23 JAMES WHITTAKER

24

25

MR. WHITTAKER: If I'd have thought a little

1 sooner, I'd have brought a rope and just had the environmen-
2 talists and I guess the BLM and livestock and everybody just
3 stand up here and we'd have had a tug of war and decided
4 this tonight. But anyway, testimony on the draft resource
5 and environmental impact statement for the Lemhi Resource
6 Area. I'm James Whittaker, Leodore livestock operator.
7 First I'd like to commend the Lemhi resource management
8 team for doing an admirable job on the task set before them.
9 The various alternatives certainly represent everyone's
10 interest, but it's very apparent that we have a different
11 team there than we had. I don't know if it was twenty years
12 ago or fifteen years ago, but anyway from the last time that
13 alternative A was apparently drawn up.

14 After a thorough review of the draft and all alterna-
15 tives these are the points that I'd like you to ponder.
16 Fiscal responsibility, as far as I'm concerned, this should
17 have been the number one issue. I don't know. It seems
18 like at this time, why, when we have such huge federal
19 deficits and everything that it's got to be the number one
20 issue; and it wasn't brought up. We had nine other issues,
21 but fiscal responsibility wasn't one of them. But I want
22 to go over some costs here. Heather already explained some
23 of them, but management costs of alternative A, the existing
24 situation, would cost an additional a hundred sixty-four
25 thousand. B would be two million two hundred sixty-seven

1 thousand seventy. C would be one million six hundred
2 twenty-six thousand seven hundred sixty-six. D would be
3 one million three hundred eighty-two thousand three hundred
4 forty. Alternative E would be one million five hundred
5 ninety-seven thousand four hundred seventy-seven. The
6 preferred alternative F would be one million seven hundred
7 twenty-one thousand six hundred eighty-seven, which is
8 approximately a hundred twenty percent of the existing
9 situation.

10 Now, can we afford that right now? I don't think
11 we can. I don't think we can. The revenues generated are
12 fairly consistent, running around five hundred fifty
13 thousand dollars. The receipts received from all the
14 alternatives are fairly consistent, around four hundred
15 eighty thousand dollars coming back to our county and state
16 government here in Idaho. And for alternative G, the
17 economic impacts are largely the same as for alternative F.

18 It might be well to reiterate where the revenues
19 are generated and that they're fairly consistent among all
20 the alternatives. Number one is grazing fees, seventy-one
21 thousand seven hundred. Now, this really isn't truly
22 representative of the amount. That's the total dollars
23 all right, but how many permittees in this room are putting
24 in money every year just using our own as an example?

25 I've been pretty well associated for the last

1 twenty-five years, and I can remember when the range was
2 adjudicated, and my father was on the BLM Advisory Board
3 at that time. He was one of the two guys in the United
4 States that served the full length of the time from the
5 time that advisory board was initiated until it went out
6 of existence. But in that length of time we're running
7 right close to fifty miles of fence. That's two miles of
8 fence we put in each year. We also put in approximately
9 twenty-five miles of pipeline. On that fifty miles of
10 fence, why, the material was furnished. A lot of it was
11 on the Gilmore Summit on that right of way fence, and I
12 personally with a crew built that fence up over there on
13 a contract from my father. And he put up all the money for
14 the actual construction of the fence. We didn't furnish
15 the material, but nearly all the fence that's up there,
16 why, we furnished the construction for it. And if you
17 figured that on today's figures of approximately twelve
18 hundred dollars a mile, why, we've got sixty thousand
19 dollars right there. Plus we've got twenty-five miles of
20 pipeline. I didn't calculate that. Plus we bought a lot
21 of those AUM's and made as high as I think in the fifties
22 I think we paid for the last ones. I don't know. Maybe I
23 have a weighted point of view -- I really do -- because I've
24 got an investment out there, and I don't think most of
25 these recreationists have an investment out there.

1 But to top it all off, when my mother died in 1971,
2 why, the IRS come in. They think a little different than
3 the BLM and Forest Service. They said, "Hey, you've got
4 a valuation out there." So they figured them up. I don't
5 remember the exact figures, but I think the tax was figured
6 at twenty-five percent. So they apparently gave two hundred
7 thousand dollars valuation that we had out there. We paid
8 twenty-five thousand dollars taxes on this. Well, then we
9 come along and just like has already been mentioned people
10 change. Times change. But the livestock operator out
11 there, he stays the same, and he tries to make a living out
12 there.

13 And we got out and we maintained those troughs. We
14 go out and check them three times a week. They want to put
15 bird ladders in them. In the last summer I think I've seen
16 half a dozen birds in water troughs out there that died.
17 They weren't bald eagles or that other bird that's up for
18 extinction. Now, is it really feasible to go in and require
19 bird ladders in all these water troughs?

20 Not only that, but we had a larkspur problem here.
21 Oh, it's been about three or four years ago now. I think
22 you remember that we dropped about twenty-six cows and two
23 bulls off there in twenty-four hours. And at that time I
24 figured cows were worth five hundred dollars. So there's
25 thirteen thousand plus two bulls at a thousand dollars apiece.

1 There's another fifteen thousand. The next year we dropped
2 another seventeen.

3 Anyway, we're getting quite a sizable investment out
4 there. If you'll look as you drive out through there, why,
5 I see plenty of antelope and plenty of deer. And they're
6 using our water facilities; and we're maintaining them
7 for these environmentalists all the time.

8 But, anyway, I'll get back to my prepared text. I
9 don't know. Some of those things just get to eating on me
10 a little bit because when I go on down their list I see
11 mineral leasing, four hundred ten thousand. These boys are
12 paying their fair share. Land sales, thirty-six thousand
13 one hundred. Timber sales, thirty-five thousand two hundred.
14 And I think considering the areas that's included here, why,
15 maybe that's realistic.

16 Then I come down to recreation fees, and it's
17 consistent on all these. Five hundred dollars? Five
18 hundred dollars on five hundred thousand acres? Boy, that's
19 really a return, isn't it?

20 And these environmentalists, I looked in the back
21 section there. They had all the agencies that had been
22 contacted, and I see that eight of them are environmental
23 organizations. How many were livestock or resource industry
24 organizations? Five. So you know why I didn't bring that
25 rope tonight. We'd all have been off the cliff in a hole.

1 We damn near are now.

2 To further restrict and increase our costs of doing
3 business without a commensurate increase in production
4 goals for our resource industries certainly will not help
5 Lemhi County.

6 Stocking levels, alternative A, the five-year average
7 use was the base line used to determine the proposed
8 stocking level. Now, that sounds kind of realistic to me.

9 Alternative B, the proposed stocking level was based
10 on improvement of one-third of the total acres in fair
11 condition. Now, that sounds good, but sometimes what the
12 BLM expects us to do and what they actually do are two
13 different things. So this may be something down the road
14 on that.

15 C, D, E, F, and G are all based on from nine to
16 fifteen acres per AUM. Now, this really isn't a viable
17 alternative when range sites vary from two to three acres
18 per AUM to as much as forty acres per AUM.

19 Game populations, I believe our present wildlife
20 populations are about all that are sustainable considering
21 we have a limited amount of winter range and the increasing
22 wildlife deprivation problem on the private lands that is
23 materializing. We already had elk in the haystacks up there
24 now.

25 This is kind of an unusual year. We may find out this

1 year that we have too many game if we have heavy snow
2 this early and it hangs on late. My father said that the
3 last drought -- he's been predicting an early winter all
4 the time. He said, "Prepare yourself, Son. Tough times
5 is here." And I think maybe he's right. He said that he
6 remembered -- his father's home ranch was just back of ours.
7 He said that the last time it had a drought year like this
8 up there that the snow come on there in October, the first
9 day of May there wasn't a bare spot on the ranch. So we
10 might just be on the verge of this iceberg of this
11 depredation problem.

12 Forage allocation for wildlife, it's not really
13 quantifiable to any degree of accuracy at this time.
14 I feel it's premature. It should have been left out of
15 the statement altogether.

16 Riparian Habitats, a Problem or an Opportunity, a
17 speech by Larry Bryant of Starky Range Experiment Station,
18 LeGrande, Oregon. His research proved that stream bank
19 erosion attributable to livestock is almost immeasurable,
20 that rapid spring runoff and icing contribute a much greater
21 magnitude of bank erosion and stream bed sediment
22 than any other cause.

23 He had one illustration there where fourteen feet
24 had been wiped out in five minutes. They're actually
25 measuring livestock erosion in centimeters, four to five,

1 as I remember right, according to his talk. I went up to it
2 at Challis the other day. Also grazing was actually benefi-
3 cial because it prevented the old grasses from becoming
4 matted, thus reducing the production. Fencing to prevent
5 livestock grazing is not the answer.

6 Fence standards, fence standards need to be modified
7 to meet the situation. Road right of ways need at least a
8 four barbed, sixteen-inch bottom, forty-six inch top wire
9 for public safety.

10 I really don't know whether this is adequate or not.
11 There was probably two weeks straight -- this year was a
12 little dry year, and we had a little increased pressure up
13 there on Gilmore Summit; but I still lost two cows and a
14 calf. There was two weeks straight we went up there every
15 night just to check on that, make sure we had them off the
16 road. We still didn't. We supposedly went along that fence
17 and maintained good four-barb wire fence, but for some
18 reason those calves could always find their way out.

19 They have a libel suit now up on Yankee Fork. It's
20 in the million dollar range for livestock getting out on the
21 highway, right of way. So we certainly don't want to
22 decrease our fence standards along any public right of ways.

23 This fence is necessary in other places because of
24 topography, class of livestock, sheep, yearling cattle.

25 A three-barb wire fence certainly won't hold yearling

1 cattle. It certainly won't hold sheep at all. Four barb
2 will kind of hold sheep until we take the wool off. Then
3 it won't.

4 Before any fences are modified there should be
5 proof that they are restricting game animals. I have yet
6 to see any game animals restricted for over about five
7 seconds going down that road.

8 Just right out of Leadore is a real good illustration.
9 That fence doesn't run a quarter mile from the creek, but
10 these deer like to go up that creek. You better go a little
11 easy when you go across Big Timber Creek because they're
12 going to be on that road and jumping that fence. They're
13 restricted right there for just five seconds to make up their
14 mind to jump over that fence instead of going out to the
15 cattle guard and around where there isn't any fence. I've
16 never seen a deer do that all the time I've been there.
17 Pictures should be taken with dates and times as evidence.
18 As far as I'm concerned, why, that's no alternative at all.
19 We can get a new employee at BLM that's wildlife minded,
20 and he suspects that my fence is restricting game. Why,
21 I just can't bite that one off. I got to live with that
22 for the next twenty-five years or so.

23 Early spring grazing, most of the problems are
24 caused by the lack of an allotment management plan where
25 the units would be rotated.

1 I'll agree that these plants can be eaten off too
2 early, but I think that we've come to a point now in time
3 that the livestock industry realizes that in order to have
4 cows make money they have to breed on time in sixty-day
5 breeding season. In order to do this the feed had to be
6 adequate out there on the BLM when you breed out there,
7 which we do. To set the date back, why, on a dry year or
8 an exceedingly early year, why, the change in management
9 -- the BLM can't fluctuate, but we can fluctuate. If the
10 feed's not there, why, we don't put the animals out there is
11 about what it amounts to.

12 I know there's a lot of opinion on that. You come
13 up and say, there isn't grass, but the cattle are doing
14 good. Why, as far as I'm concerned, there is adequate
15 grass cover out there.

16 Some of these ranges could be reseeded to crested
17 wheat grass and greatly increase the carrying capacity for
18 livestock and game. We don't have to reinvent the wheel
19 on this crested wheat thing. It's proven up there. We've
20 got it up on my Uncle Bob Adams's. We've got a lot on my
21 own there. We had seven to ten head of antelope that come
22 and go through a woven wire fence and three barbs there to
23 summer in our crested wheat for the last three years, and
24 to say that game don't like that or that the fence is
25 restricting game, why, I haven't hardly seen any game

1 restricted on account of a fence. If they want an alfalfa
2 patch or crested wheat feeding, why, they go there.

3 Minimum stream flow, those advocating minimum stream
4 flow in Big Timber Creek do not realize the amount of water
5 it takes from the mouth of the canyon to the Lemhi River
6 or for that matter from Garner's Ditch to the Lemhi River.

7 The creek owners were apparently all in compliance
8 with this because McCrays have always had a right out of
9 Timber Creek, and this last year it was exchanged to Lloyd
10 Garner for a right out of Timber Creek because it took so
11 much water to go from Garner's ditch down to that point.

12 I realize that there's a date cutoff on the BLM,
13 but the thing about it is Big Timber Creek had a real high
14 spring flow, and there's still a lot of ground that's
15 capable of being put in desert land entry. If that was
16 cut off after some of them filed desert land entries or
17 something like that, why, I can't visually or financially
18 see where we'd gain anything from having a minimum stream
19 flow in Big Timber Creek because the rights -- it would only
20 be while high water was on anyway if it's set off in the
21 fifties or whatever. After then, why, it would be cut off
22 anyway; so you wouldn't have a minimum stream flow.

23 THE HEARING OFFICER: Excuse me, Jim. Let me
24 ask if there is anyone else that wants to speak. Keep your
25 place. If not, we'll continue with Jim.

1 (No response)

2 THE HEARING OFFICER: Go ahead.

3 MR. WHITTAKER: Okay. The conclusion, initially
4 a lot of thought and study went into alternative A. At this
5 time it still fills the needs of all interests the best if
6 the BLM would just go ahead and complete the rest of the
7 allotment management plans. Most of the problems listed
8 above are not contained in alternative A and we can afford
9 it.

10 The BLM will best serve Idaho by continuing to
11 balance the recreational and asthetic values of public land
12 with commodity production. Putting emphasis on recreation
13 and wildlife over commodity production is not in Lemhi
14 County's best interest. Right now everyone in Lemhi County
15 should emphasize creating and preserving jobs, not
16 increasing the federal deficit.

17 The tourist boom has never materialized. Common
18 sense dictates that more wilderness will not draw any more
19 tourists than we have now. And are our miners, lumberjacks,
20 and livestock men supposed to pump gas for the Canadians
21 and Ohioans? Public lands do not have to be wilderness
22 to be protected.

23 Let us remember what has made this nation great,
24 private enterprise, not government domination or a public
25 playground. Thank you.

1 THE HEARING OFFICER: Now, is there anybody
2 that didn't sign up to speak that would like to speak at
3 this time? We've still got plenty of time.

4 (No response)

5 THE HEARING OFFICER: If not, I guess we're
6 adjourned.

7 (Thereupon the proceedings were concluded at
8 8:20 p.m., November 20, 1985.)

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OFFICER'S CERTIFICATE

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STATE OF IDAHO)
County of Bonneville) SS

I, Rebecca Myers, certified shorthand reporter and notary public, hereby certify that the foregoing transcript, consisting of pages numbered from one to 32, inclusive, is a full, true, and correct transcript and record of the proceeding had at the public hearing of said cause on November 20, 1985.

DATED this 26th day of November, 1985.

(Signed) Rebecca Myers
Rebecca Myers
Certified Shorthand Reporter
Notary Public

(Seal)

My Commission Expires: 3/24/87

GLOSSARY

Commercial Forest Land: Forest land that is capable of yielding at least 20 cubic feet of wood per acre per year of commercial coniferous tree species.

Crucial Winter Range: That habitat which is absolutely basic to maintaining a viable wildlife population through the winter season, or an area used by wildlife during every winter regardless of conditions.

FLPMA: The Federal Land Policy and Management Act of 1976. FLPMA provides guidelines for the administration, management, protection, development, and enhancement of the public lands administered by the Bureau of Land Management.

MBF: The abbreviation used by foresters to indicate a volume of one thousand board feet of timber. A board foot of timber is a piece of woody material with the dimension of 12" x 12" x 1".

Multiple Use: "... the management of the public lands and their various resource values so that they are utilized in the combination that will best meet the present and future needs of the American people; making the most judicious use of the land for some or all of these resources or related services over areas large enough to provide sufficient latitude for periodic adjustments in use to conform to changing needs and conditions; the use of some lands for less than all of the resources; a combination of balanced and diverse resource uses that take into account the long term needs but not limited to recreation, range, timber, minerals, watershed, wildlife and fish, and natural scenic, scientific and historical sources 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." (From Section 103, FLPMA)

Naturalness: Refers to an area which "generally appears to have been affected primarily by the forces of nature, with the imprint of man's work substantially unnoticeable." (From Section 2(c), Wilderness Act)

Outstanding: 1. Standing out among others of its kind; conspicuous; prominent. 2. Superior to others of its kind; distinguished; excellent.

Planning Area: The area for which management framework plans are prepared and maintained. In most instances, it is the same as the resource area, which is a geographic portion of a BLM district, under supervision of an area manager.

Post-FLPMA Leases: Leases issued after October 21, 1976, the date of passage of the Federal Land Policy and Management Act.

Preliminary Wilderness Recommendation: Refers to a wilderness recommendation at any stage prior to the time when the Secretary of the Interior reports his recommendation to the President. Until the Secretary acts, the recommendation is "preliminary" because it is subject to change during administrative review.

Primitive and Unconfined Recreation: Nonmotorized and nondeveloped types of outdoor recreational activities.

Region: A homogeneous geographical area generally larger than the planning area under study, whose boundaries are determined through the EIS scoping process and the identification of issues. Its boundaries should encompass (1) all lands that would be affected by the land use allocating proposed for the planning area, and (2) all lands which have an effect on the activities occurring in the planning area.

Solitude: 1. The state of being alone or remote from habitations; isolation. 2. A lonely, unfrequented, or secluded place.

Substantially Unnoticeable: Refers to something that either is so insignificant as to be only a very minor feature of the overall area or is not distinctly recognizable by the visitor as being man-made or man-caused, because of age, weathering, or biological change.

Suitability: As used in the Federal Land Policy and Management Act, refers to a recommendation by the Secretary of the Interior that certain Federal lands satisfy the definition of wilderness in the Wilderness Act and have been found appropriate for designation as wilderness on the basis of an analysis of the existing and potential uses of the land.

Vehicle Way: A travel route maintained solely by the passage of vehicles.

Wilderness: The definition contained in Section 2(c) of the Wilderness Act of 1964.

Wilderness Area: A area formally designated by Act of Congress as part of the National Wilderness Preservation System.

Wilderness Inventory: An evaluation of the public lands in the form of a written description and map showing the lands that meet the wilderness criteria as established under Section 603(a) of FLPMA and Section 2(c) of the Wilderness Act, which are referred to as Wilderness Study Areas (WSAs).

Wilderness Management: The management of human use and influence on lands which have been designated by Congress as wilderness area.

Wilderness Program: The term used to describe all wilderness activities of the Bureau of Land Management including inventory, study, management, and administrative functions.

Wilderness Recommendation: A recommendation by the Bureau of Land Management, the Secretary of the Interior, or the President, with respect to an area's suitability or unsuitability for preservation as wilderness.

Wilderness Reporting: The process of preparing the reports containing wilderness recommendations on wilderness study areas and transmitting those reports to the Secretary of the Interior, the President, and Congress.

Wilderness Review: The term used to cover the wilderness inventory, study, and reporting phases of the wilderness program of the Bureau of Land Management.

Wilderness Stipulation: A special stipulation attached to post-FLPMA leases which details the nonimpairing criteria for activities in WSAs.

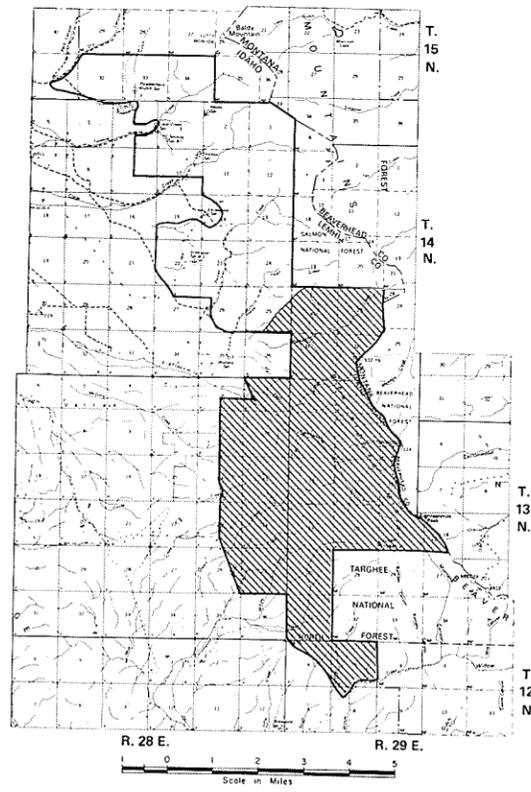
Wilderness Study: The process which specifies how each wilderness study area must be studied through the BLM planning system, analyzing all resources, values and uses within the WSA to determine whether the area will be recommended as suitable or unsuitable for wilderness designation.

Wilderness Study Area (WSA): A roadless area or island that has been inventoried and found to have wilderness characteristics as described in Section 603 of FLPMA and Section 2(c) of the Wilderness Act of 1964.

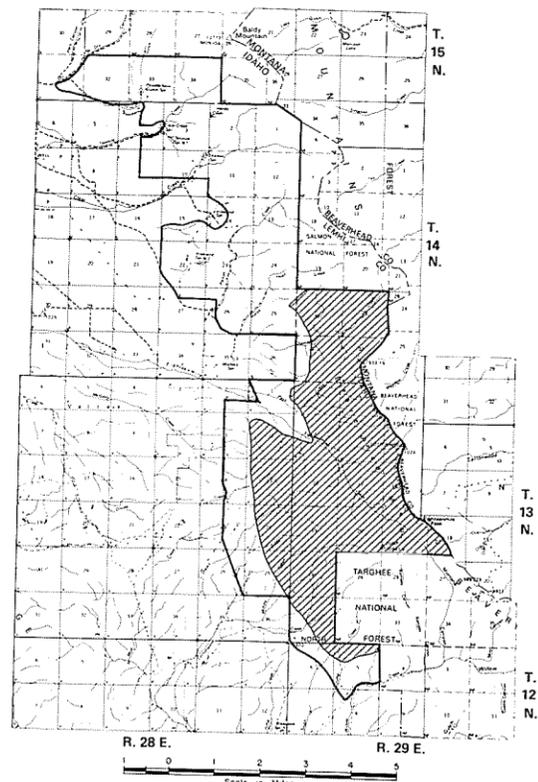
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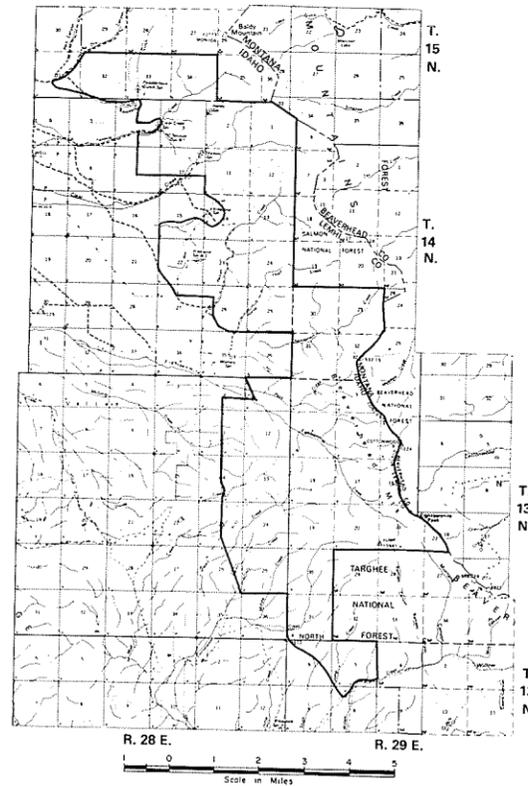
MAP 3
EIGHTEENMILE WSA
PROPOSED ACTION and ALTERNATIVE



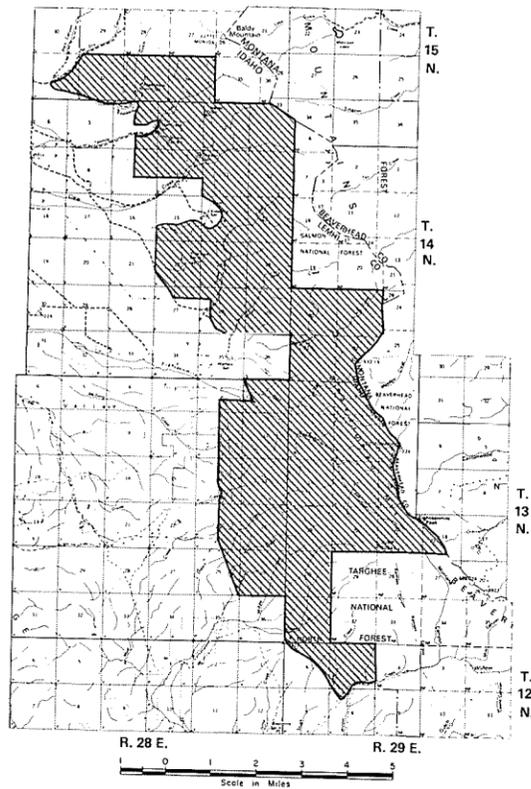
Proposed Action
Partial Wilderness / Development



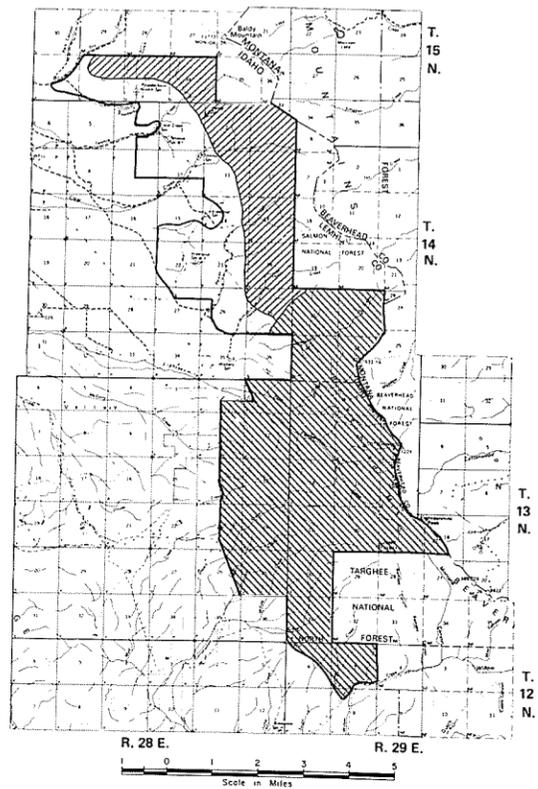
No Wilderness / Retention



No Wilderness / Development



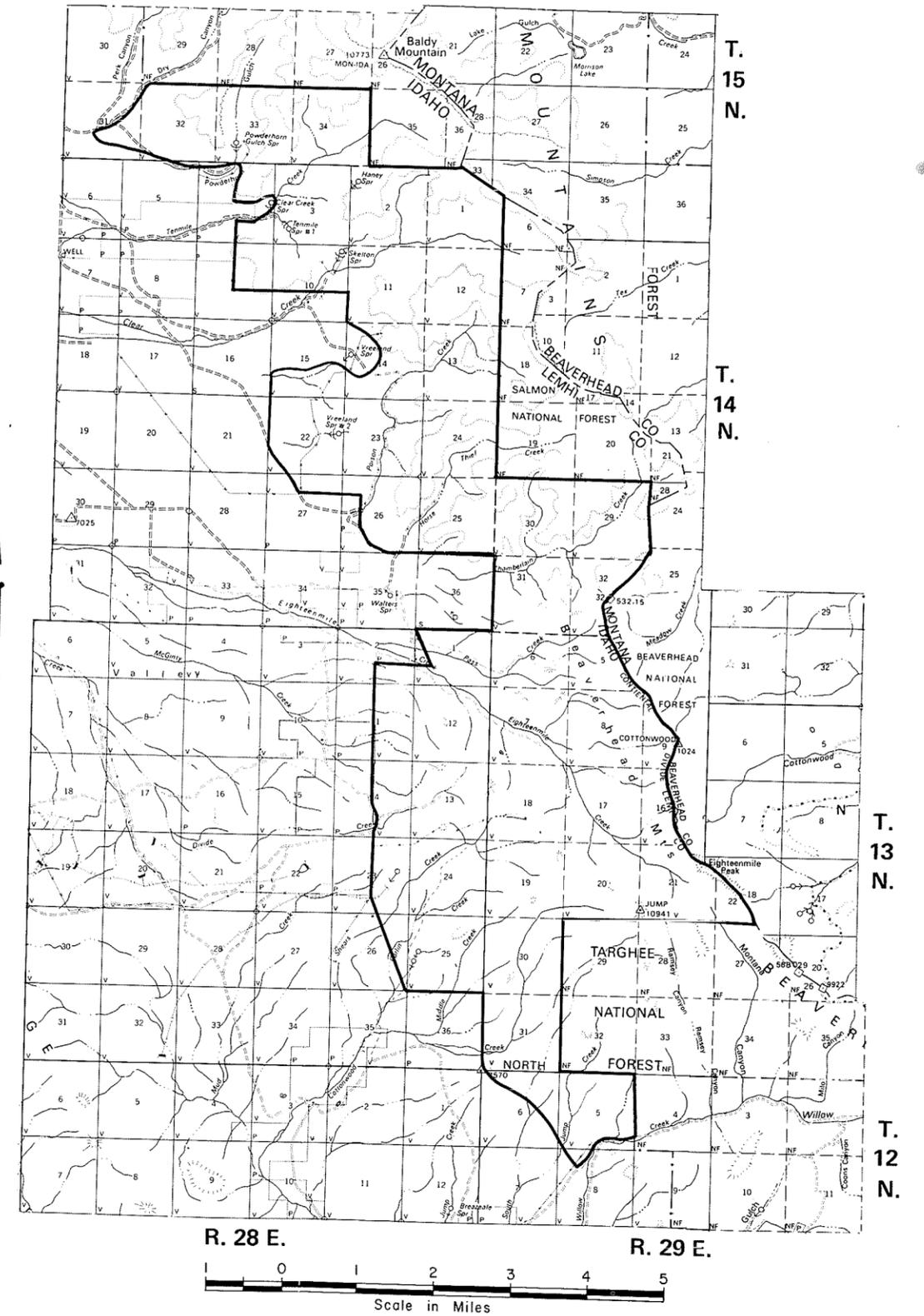
All Wilderness



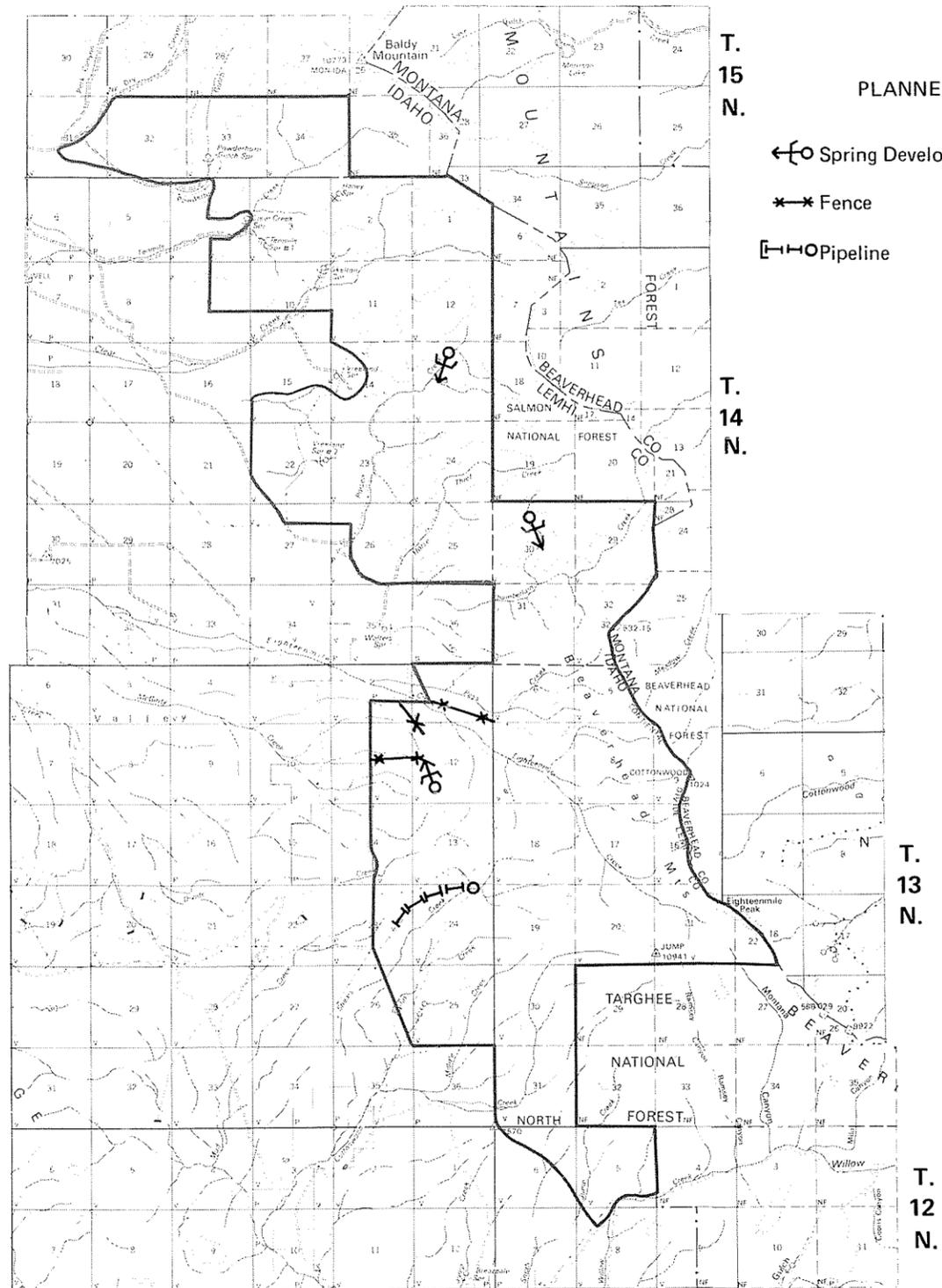
Partial Wilderness / Retention

ALTERNATIVE MAPS

- Wilderness
 - Wilderness
- Nonwilderness
 - Open for Development
 - Roadless Management

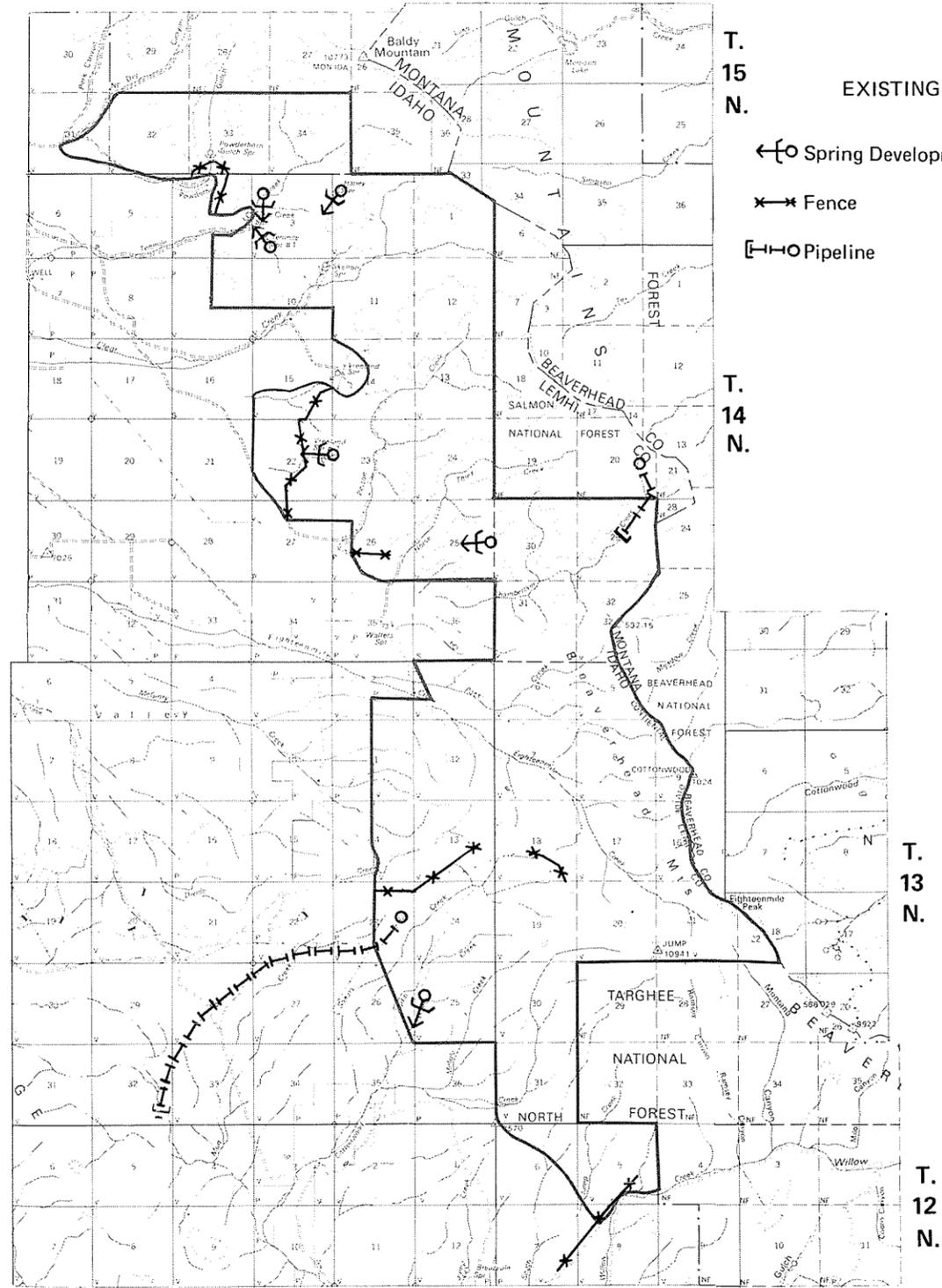
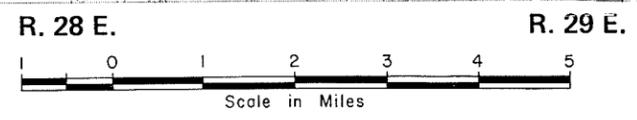


EXISTING and PLANNED RANGE IMPROVEMENTS



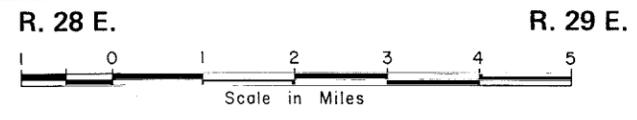
PLANNED

- Spring Development
- Fence
- Pipeline

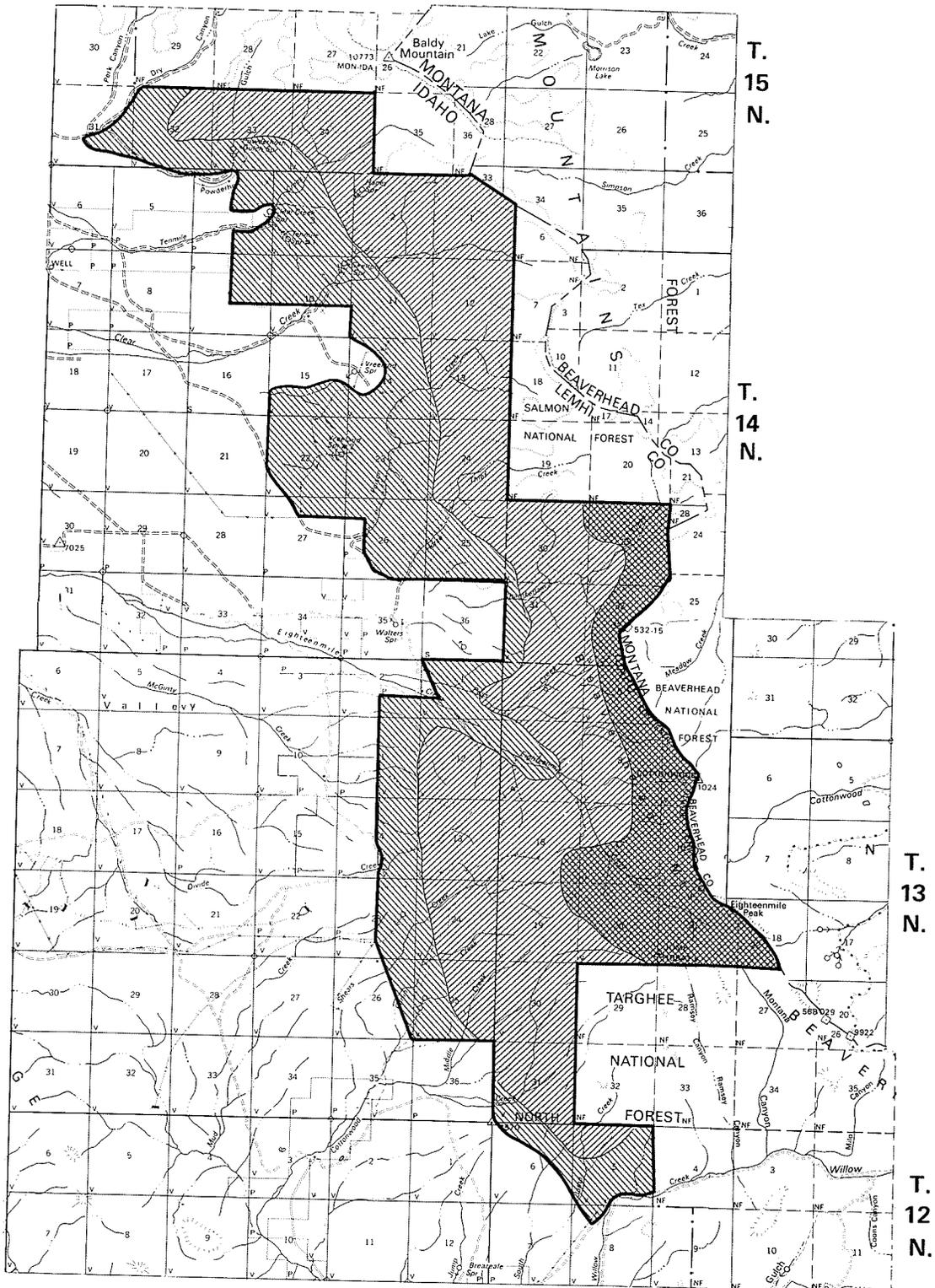


EXISTING

- Spring Development
- Fence
- Pipeline



MAP 5 RECREATION OPPORTUNITIES



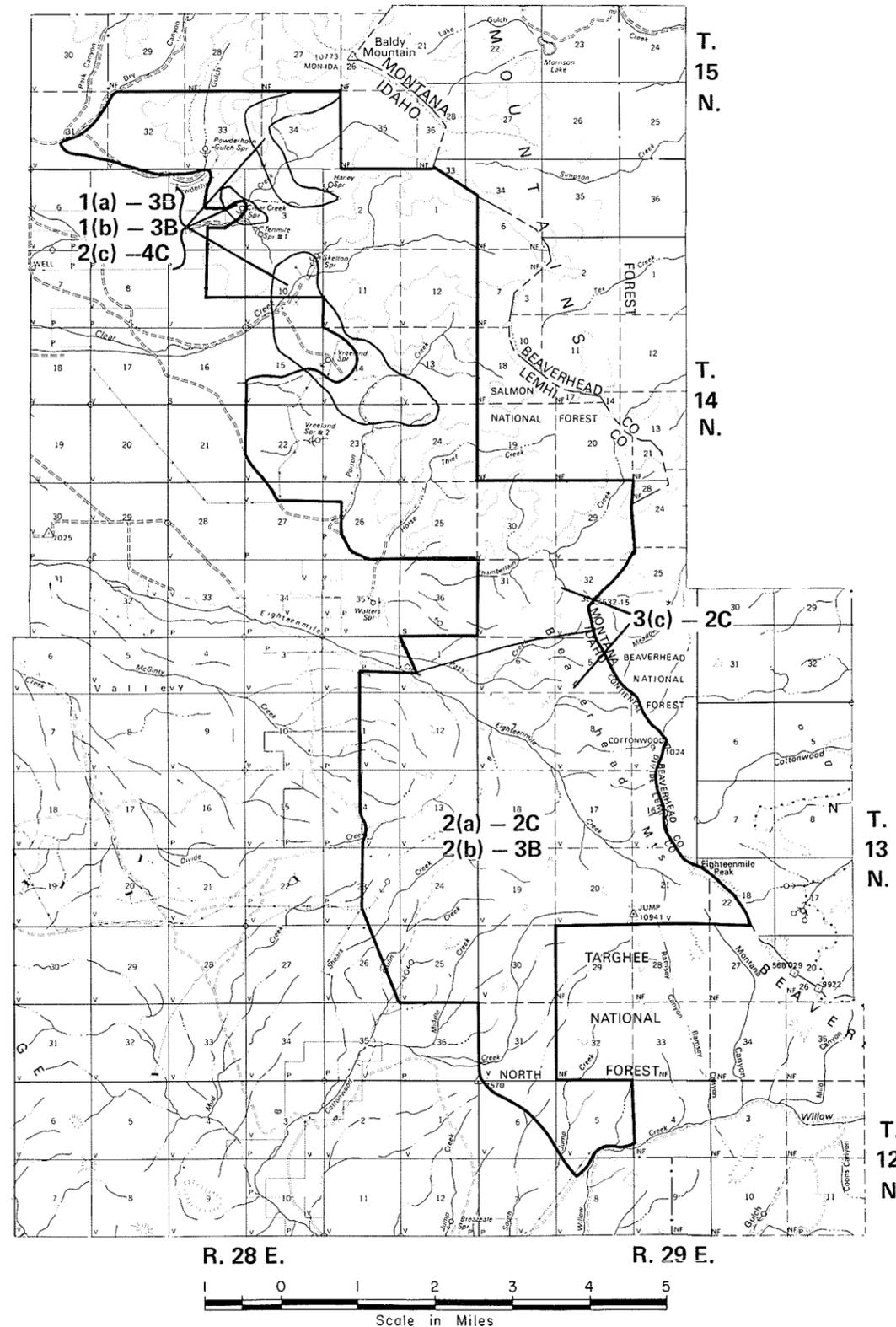
R. 28 E.

R. 29 E.



- Primitive
- Semi-Primitive Nonmotorized
- Semi-Primitive Motorized

LOCATABLE MINERALS LAND CLASSIFICATION



BLM LAND CLASSIFICATION SYSTEM
FOR GEM RESOURCES

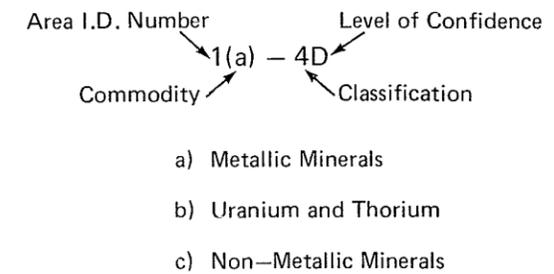
CLASSIFICATION SCHEME

1. THE GEOLOGIC ENVIRONMENT AND THE INFERRED GEOLOGIC PROCESSES DO NOT INDICATE FAVORABILITY FOR ACCUMULATION OF MINERAL RESOURCES.
2. THE GEOLOGIC ENVIRONMENT AND THE INFERRED GEOLOGIC PROCESSES INDICATE LOW FAVORABILITY FOR ACCUMULATION OF MINERAL RESOURCES.
3. THE GEOLOGIC ENVIRONMENT, THE INFERRED GEOLOGIC PROCESSES, AND THE REPORTED MINERAL OCCURRENCES INDICATE MODERATE FAVORABILITY FOR ACCUMULATION OF MINERAL RESOURCES.
4. THE GEOLOGIC ENVIRONMENT, THE INFERRED GEOLOGIC PROCESSES, THE REPORTED MINERAL OCCURRENCES, AND THE KNOWN MINES OR DEPOSITS INDICATE HIGH FAVORABILITY FOR ACCUMULATION OF MINERAL RESOURCES.

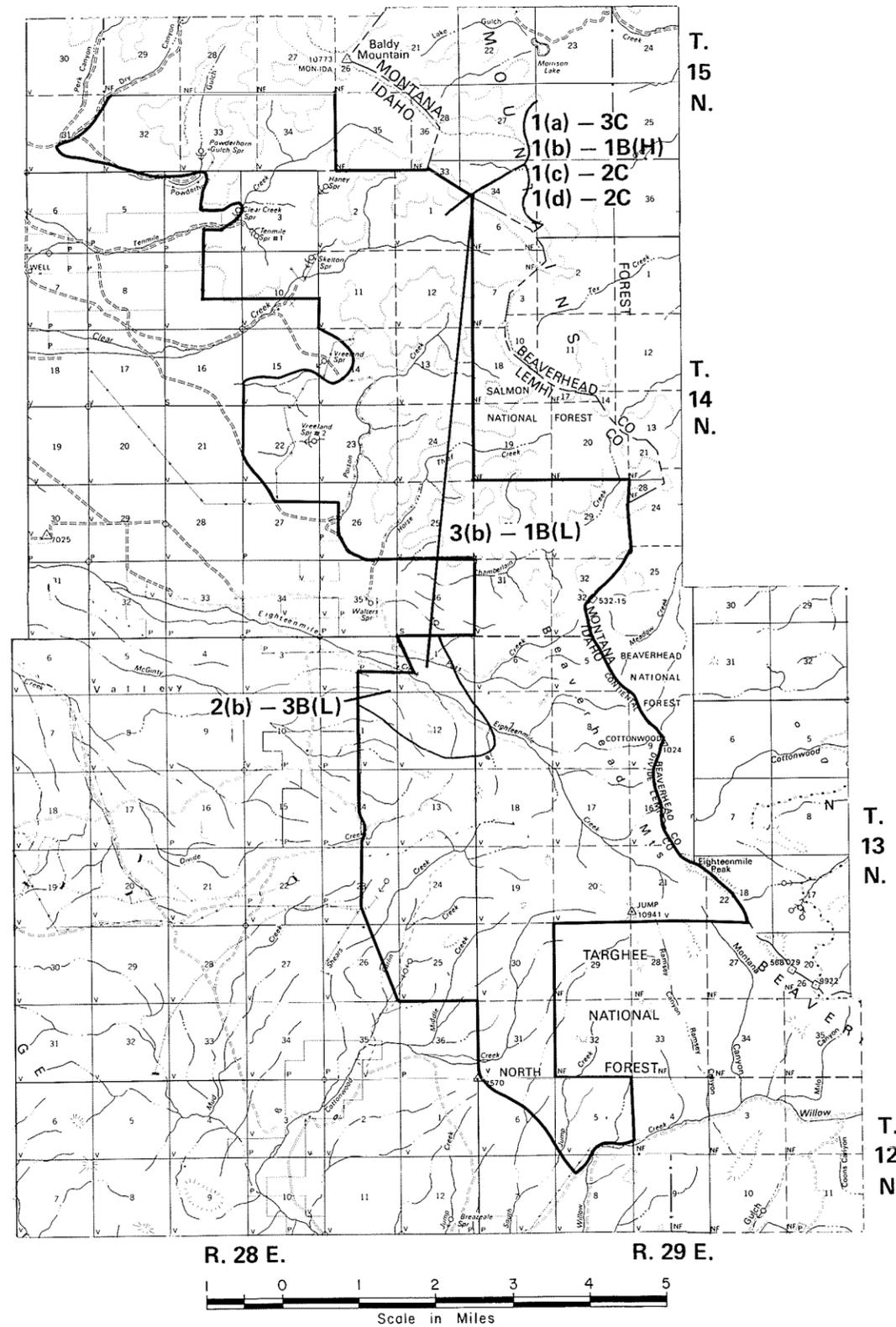
LEVELS OF CONFIDENCE

- A. THE AVAILABLE DATA ARE EITHER INSUFFICIENT AND/OR CANNOT BE CONSIDERED AS DIRECT EVIDENCE TO SUPPORT OR REFUTE THE POSSIBLE EXISTENCE OF MINERAL RESOURCES WITHIN THE RESPECTIVE AREA.
- B. THE AVAILABLE DATA PROVIDE INDIRECT EVIDENCE TO SUPPORT OR REFUTE THE POSSIBLE EXISTENCE OF MINERAL RESOURCES.
- C. THE AVAILABLE DATA PROVIDE DIRECT EVIDENCE, BUT ARE QUANTITATIVELY MINIMAL TO SUPPORT OR REFUTE THE POSSIBLE EXISTENCE OF MINERAL RESOURCES.
- D. THE AVAILABLE DATA PROVIDE ABUNDANT DIRECT AND INDIRECT EVIDENCE TO SUPPORT OR REFUTE THE POSSIBLE EXISTENCE OF MINERAL RESOURCES.

EXPLANATION



LEASABLE MINERALS LAND CLASSIFICATION



BLM LAND CLASSIFICATION SYSTEM
FOR GEM RESOURCES

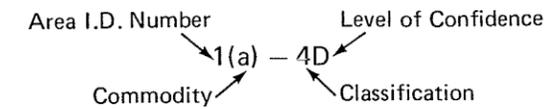
CLASSIFICATION SCHEME

1. THE GEOLOGIC ENVIRONMENT AND THE INFERRED GEOLOGIC PROCESSES DO NOT INDICATE FAVORABILITY FOR ACCUMULATION OF MINERAL RESOURCES.
2. THE GEOLOGIC ENVIRONMENT AND THE INFERRED GEOLOGIC PROCESSES INDICATE LOW FAVORABILITY FOR ACCUMULATION OF MINERAL RESOURCES.
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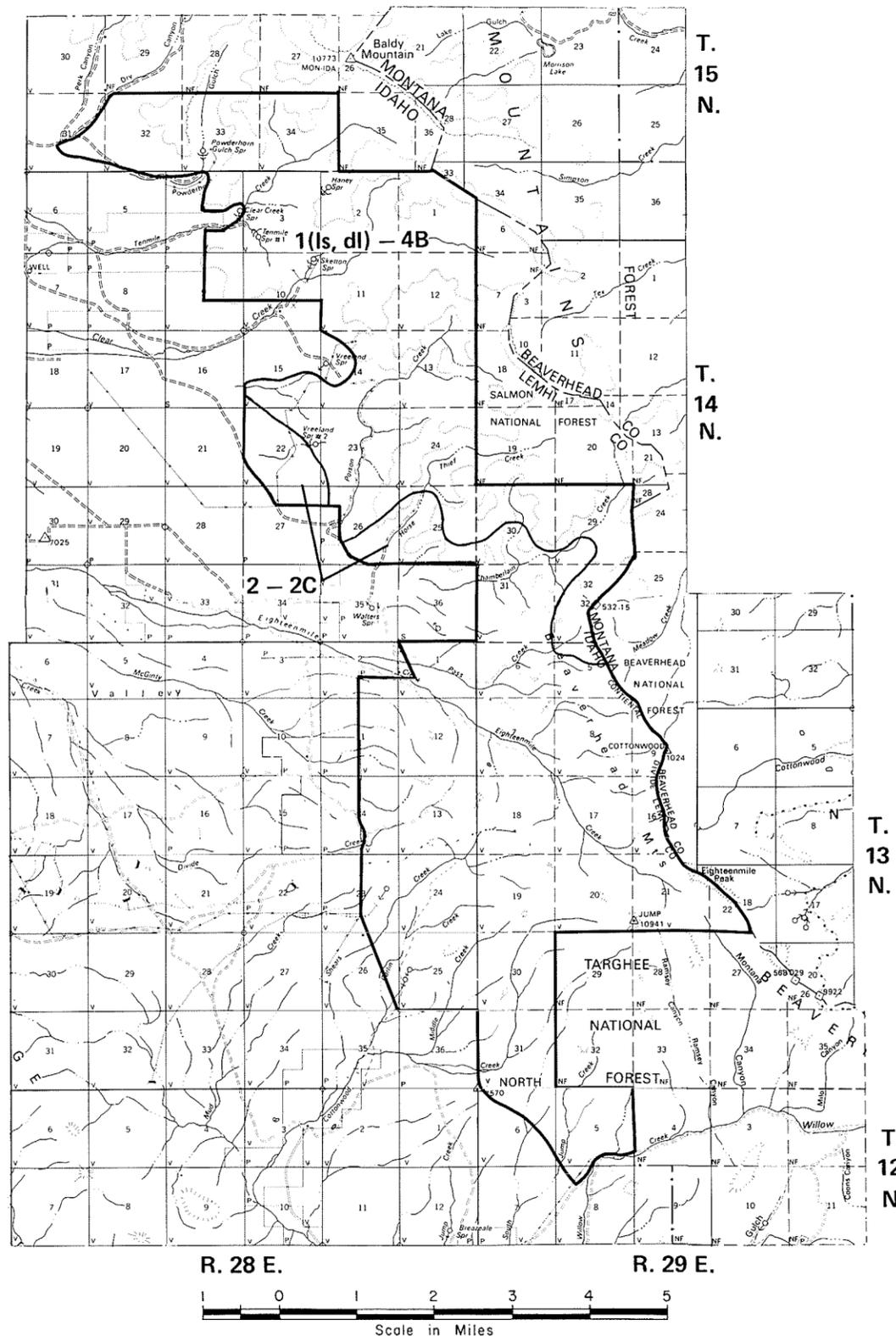
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- D. THE AVAILABLE DATA PROVIDE ABUNDANT DIRECT AND INDIRECT EVIDENCE TO SUPPORT OR REFUTE THE POSSIBLE EXISTENCE OF MINERAL RESOURCES.

EXPLANATION



- a) Oil and Gas
- b) Geothermal: High temperature (H), Low temperature (L)
- c) Sodium and Potassium
- d) Others: Asphalt (As), bitumen (bt), phosphate (ph). No specific commodity designation indicates that the rating applies to all of the above.

SALEABLE MINERALS LAND CLASSIFICATION



BLM LAND CLASSIFICATION SYSTEM
FOR GEM RESOURCES

CLASSIFICATION SCHEME

1. THE GEOLOGIC ENVIRONMENT AND THE INFERRED GEOLOGIC PROCESSES DO NOT INDICATE FAVORABILITY FOR ACCUMULATION OF MINERAL RESOURCES.
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- D. THE AVAILABLE DATA PROVIDE ABUNDANT DIRECT AND INDIRECT EVIDENCE TO SUPPORT OR REFUTE THE POSSIBLE EXISTENCE OF MINERAL RESOURCES.

EXPLANATION

Area I.D. Number		Level of Confidence	
↓ 1 (ls, dl) - 4D		↓	
Commodity		Classification	
s	Sand	cl	Clay
g	Gravel	ls	Limestone
st	Stone	dl	Dolomite
c	Cinders	P	Peat
p	Pumice	pw	Petrified
pt	Pumicite		