

# Sand Mountain Wilderness Study Area

## 1. The Study Area -- 21,100 acres

The Sand Mountain WSA (ID-35-3) is located in Fremont and Jefferson Counties ten miles west of the city of St. Anthony, Idaho. The WSA includes 21,100 acres of public land. Inholdings consist of one 640 acre tract of state land (see Table 1). A small five acre parcel of private land is located 500 feet west and inside the WSA's eastern boundary where the owner operates a resort and campground for off-road vehicle enthusiasts. Boundaries of the WSA are generally a county road on the east and southwest, a BLM road on the west and state and private land subdivisions on the northwest, north and southeast.

The Sand Mountain WSA is characterized by a series of large, active sand dunes. The most prominent feature is Sand Mountain which rises about 500 feet above the adjacent plain. Sand in various degrees of stabilization occupies lands surrounding most of the shifting dunes. Two old volcanic buttes and exposed areas of more recent basaltic bedrock add to the geologic diversity.

The WSA was studied under Section 603 of the Federal Land Policy and Management Act (FLPMA) and was included in the Medicine Lodge Resource Management Plan and Medicine Lodge Wilderness Final Environmental Impact Statement (FEIS) filed in December 1987. Three alternative were analyzed in the FEIS for the Sand Mountain WSA: the proposed action (no wilderness) alternative, which is the recommendation of this report; an all wilderness alternative (21,100 acres); and a partial wilderness alternative (6,560 acres).

## **2. Recommendation and Rationale**

**0 acres recommended for wilderness**

**21,100 acres recommended for nonwilderness**

The recommendation for the Sand Mountain WSA is to release the area for uses other than wilderness. The environmentally preferable alternative is the all wilderness alternative. It would cause the least change from the natural environment over the long term. The recommendation would use all practical means to avoid or minimize adverse environmental impacts. Existing regulations, BLM policy and the Medicine Lodge Resource Management Framework Plan will guide the use of the land to mitigate impacts. The Sand Mountain Proposal map shows the lands recommended nonsuitable for wilderness designation.

All 21,100 acres of the Sand Mountain WSA are recommended as nonsuitable for wilderness designation for the following reasons:

Certain conditions adversely affect BLM's ability to manage this area as wilderness over the long term. Boundaries of the area are generally drawn along legal subdivisions with no identifiable features to aid in discerning where the wilderness would begin and end. Fencing the boundaries would be necessary to protect wilderness values from trespass motor vehicle use. Numerous accesses, law enforcement issues, historical off-road vehicle use and local opposition to wilderness would further complicate manageability.

Naturalness and opportunities for solitude are less than exemplary. These wilderness values are adversely affected by influences outside the WSA. They include extensive farming activities adjacent to the WSA's eastern and southern boundaries, and frequent farm-to-market vehicle traffic along the southern boundary, the Egin-Hamer Road. Irrigation equipment, farm equipment, an off-road vehicle resort, community and farm buildings and vehicle traffic can be seen and heard, detracting from the visitor's perception of naturalness or a solitude experience.

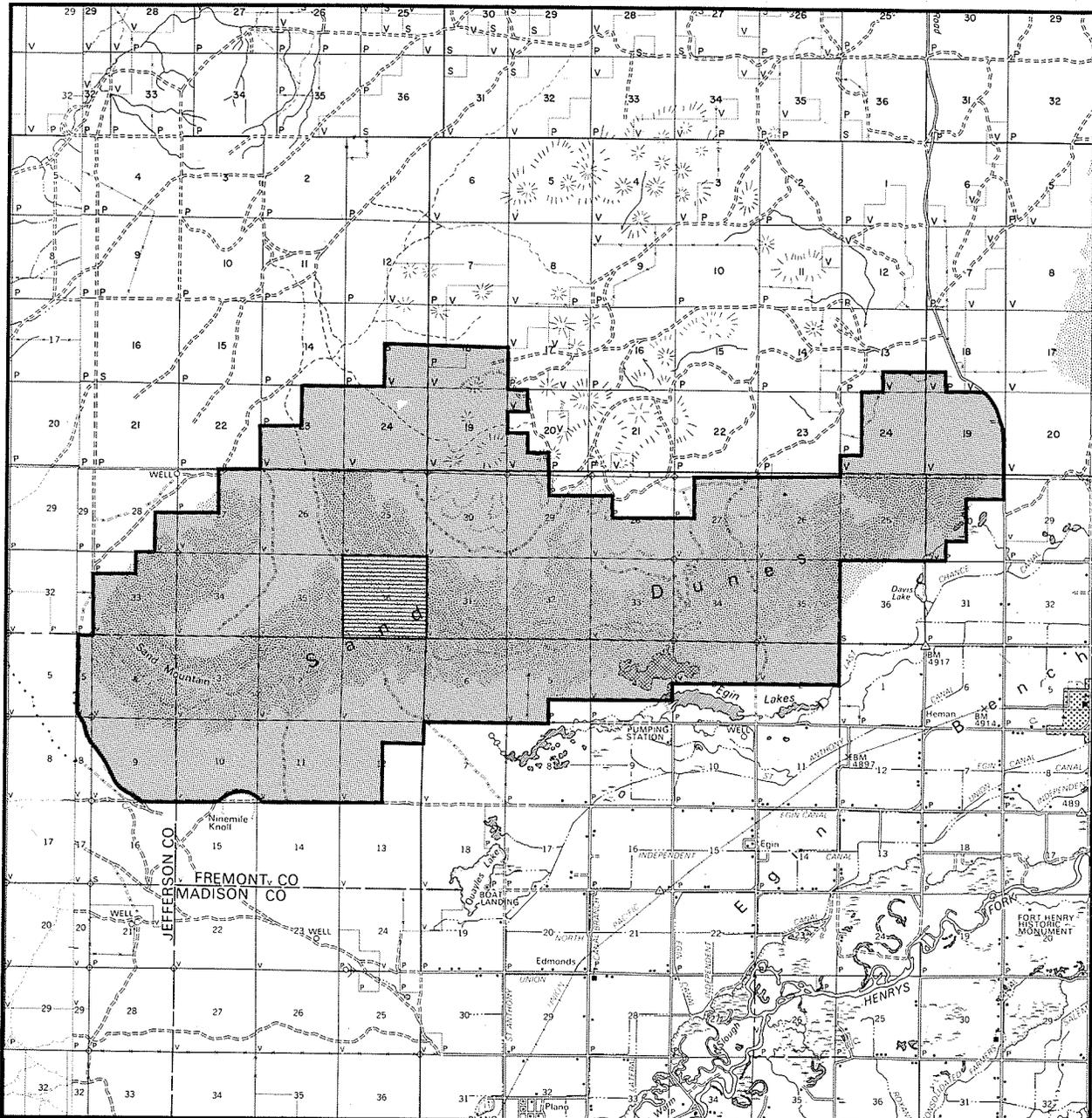
Certain resources and environmental components will benefit from the nonsuitable recommendation. Benefits include improved big game winter habitat, off-road vehicle recreation opportunities and stronger local economies.

Mechanical manipulation of winter habitat for deer, elk and moose would ensure stable and healthy populations and allow increases in herd size. Increasing the populations, particularly elk, will provide more hunting opportunities for the ever-increasing demand in southeastern Idaho. Preservation of the nearly 2,000 head of elk that winter in and near the WSA, one of the largest elk herds in the continental U.S., is of key concern to wildlife and sportsmen interests.

Motorized and developed recreation is projected to increase by as much as 350 percent by the year 2006 for an estimated total of 19,250 to 23,350 visitor use days. Opportunities for off-road vehicle riding in these extensive sand dunes would continue for Idaho citizens and benefit off-road vehicle recreationists from several nearby states. Near-unanimous comment expressed throughout the inventory, study and EIS process opposed wilderness for this area. Most of the commenters feel the area is best-suited to motorized recreation activities.

Positive local economic impact would occur with the expected influx of ORV recreationists, bringing an estimated \$1,448,400 in revenues. This projected increase in retail trade earnings would not have a significant impact on regional economies but local businesses are expected to benefit. The off-road vehicle resort located on the WSA's eastern border would not close.

The natural values and resource uses that deserve protection include existing motorized and nonmotorized recreation uses and big game winter habitat. These values would be protected through special designations and management objectives outlined in the Medicine Lodge Resource Management Plan. These designations include an Area of Critical Environmental Concern and Special Recreation Management Area. The management objectives of these designations will focus on protecting natural values and wildlife resources while providing and accommodating motorized and nonmotorized recreation uses.

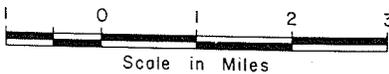


T. 9 N.  
 T. 8 N.  
 T. 8 N.  
 T. 7 N.

R. 38 E. | R. 39 E.

R. 39 E. | R. 40 E.

- |   |   |   |              |
|---|---|---|--------------|
|  | RECOMMENDED FOR WILDERNESS                  |  | SPLIT ESTATE |
|  | RECOMMENDED FOR NONWILDERNESS               |  | STATE        |
|  | LAND OUTSIDE WSA RECOMMENDED FOR WILDERNESS |  | PRIVATE      |



ID-35-3  
 SAND MOUNTAIN  
 PROPOSAL

AUGUST 1988

**Table 1 -- Land Status and Acreage Summary of the Study Area  
SAND MOUNTAIN WSA**

**Within Wilderness Study Area**

BLM (surface and subsurface)	21,100
Split Estate (BLM surface only)	0
Inholdings (state, private)	640
<b>Total</b>	<b>21,740</b>

**Within the Recommended Wilderness Boundary**

BLM (within WSA)	0
BLM (outside WSA)	0
Split Estate (within WSA)	0
Split Estate (outside WSA)	0
<b>Total BLM Land Recommended for Wilderness</b>	<b>0</b>
Inholdings (state, private)	0
State land (outside WSA)	0

**Within the Area Not Recommended for Wilderness**

BLM	21,100
Split Estate	0
<b>Total BLM Land Not Recommended for Wilderness</b>	<b>21,100</b>
Inholdings (state, private)	640

### **3. Criteria Considered in Developing the Wilderness Recommendations**

#### **Wilderness Characteristics**

##### **A. Naturalness**

The Sand Mountain WSA is essentially natural in appearance but has some human-caused imprints. These imprints include vehicle ways, livestock fences, a small deer trap, intermittent vehicle tracks on the sand and litter. About 32 miles of vehicle ways enter and cross the WSA. The ways are no more than trails that are difficult to follow, lack definition and are obscured by encroaching vegetation. Off-road vehicle tracks on the dunes are temporary impressions in the sand that disappear quickly when the wind blows. The short segments of livestock fence which total five miles, the deer trap and litter are all insignificant and are absorbed easily within this large area.

Influences on naturalness outside the WSA include views of St. Anthony, Idaho, and the sights and sounds of rural vehicle traffic and agricultural activities. These activities are most imposing near the WSA's southeastern and eastern border and from higher vantage points where topographic screening is minimal.

##### **B. Solitude**

Opportunities for solitude exist throughout most of this relatively large area. The WSA measures about ten miles from east to west and about five miles from north to south and has a fairly good configuration. Topographic screening is provided by the abrupt elevation changes and the many pockets and bowls in the dunes. Influences on solitude outside the WSA include sights and sounds of rural traffic, agricultural activities and views of St. Anthony. These influences are most noticeable near the WSA's southeastern border. Throughout most of the WSA, ample spots for seclusion are available. However, increasing ORV use on the dunes themselves are beginning to impact the wilderness values.

##### **C. Primitive and Unconfined Recreation**

Quality, diversity and challenge combine to make primitive and unconfined recreation opportunities outstanding. Hiking, horseback riding, camping, wildlife observation, photography and cross-country skiing are among the possible activities. The quality of the activities is enhanced by the exceptional and unusual sand features, scenic views and interesting plant and animal communities. The lack of reliable water, extreme temperatures and the rugged terrain all make the activities challenging.

##### **D. Special Features**

The WSA provides crucial wintering habitat for large mammals including elk, moose and deer. The elk herd in particular is dependent upon the western portion of the WSA. The herd migrates from as far away as Yellowstone National Park and Montana.

An uncommon species, evening primrose, is known to exist in the dunes. The primrose generally grows near lava rock outcrops. The dunes tiger beetle, also uncommon, thrives in sparsely vegetated areas near the dune edges.

The relative uniqueness of these noncoastal dunes provides uncommon scenic and geologic value. All of the lands within the Sand Mountain WSA have been proposed for designation as a National Natural Landmark. The area also contains a Research Natural Area in recognition of these values.

## Diversity in the National Wilderness Preservation System

### A. Assessing the Diversity of Natural Systems and Features as Represented by Ecosystems

Wilderness designation of the Sand Mountain WSA would not add a new ecosystem to the National Wilderness Preservation System (NWPS). This ecosystem is represented by one designated area with 30,245 acres. There are 11 other BLM study areas in the state under study with this ecosystem. This information is summarized on Table 2.

**TABLE 2**

#### Ecosystem Representation

Bailey-Kuchler Classification	<u>NWPS Areas</u>		<u>Other BLM Studies</u>	
	areas	acres	areas	acres
Intermountain Sagebrush Province				
<u>NATIONWIDE</u>				
Desert-Vegetation Largely Absent Ecosystem	1	30,245	12	870,403
<u>IDAHO</u>				
Desert-Vegetation Largely Absent Ecosystem	1	30,245	11	646,687
<u>NEVADA</u>				
Desert-Vegetation Largely Absent Ecosystem	0	0	1	223,716

**B. Expanding the Opportunities for Solitude or Primitive Recreation  
Within a Day's Driving Time (Five Hours) of Major Population Centers**

The Sand Mountain WSA is within a five-hour drive of two population centers. Table 3 summarizes the number and acreage of designated areas and other BLM study areas within a five-hour drive of the population centers.

**Table 3**

**Wilderness Opportunities for Residents  
of Major Population Centers**

Population Centers	<u>NWPS Areas</u>		<u>Other BLM Studies</u>	
	areas	acres	areas	acres
Boise, Idaho/Salt Lake City, Utah <sup>1</sup>	16	4,741,570	141	5,374,250

<sup>1</sup>Salt Lake City, Utah, and vicinity includes other cities of Provo, Orem and Ogden, Utah.

## **C. Balancing the Geographic Distribution of Wilderness Areas**

The Sand Mountain WSA would contribute to balancing the geographic distribution of areas within the National Wilderness Preservation System by adding an area in southeastern Idaho. In the region surrounding Idaho, the existing wilderness areas are concentrated in the Sierra Nevada Mountain Range in California; the Cascade Mountain range in Oregon and Washington; and in the Rocky Mountains of Idaho, Montana, Wyoming and Colorado. There are a few wilderness areas in Nevada, Utah, southeast Oregon and southern Idaho.

### **Manageability**

The long-term management of the Sand Mountain WSA as wilderness would be difficult. Several characteristics of the Sand Mountain WSA would complicate management as wilderness. ORV enthusiasts would be opposed to the ultimate closure, making law enforcement with a limited staff very difficult. The high number of access points, knowledge of the dunes throughout a five-state area and local opposition would take years to overcome, especially with the limited amount of quality off-road vehicle opportunities in the region.

Closing this area to motorized recreationists would also present major problems. The area has been historically used by off-road vehicle enthusiasts since the early 1960s. There has been extreme local opposition to a wilderness designation since the initial inventory by ORV enthusiasts and this sentiment has spread throughout a five-state region among other riders since so few dune-riding opportunities exist for a weekend excursion. Regular law enforcement patrols would be necessary to ensure that vehicle use was eliminated which would require additional law enforcement staff.

A considerable amount of boundary identification and motorized vehicle closure enforcement would be needed. The WSA's northern and southeastern boundaries follow legal subdivisions rather than any recognizable topographical feature or constructed road. Signing and other means of boundary identification would be necessary. Drifting sand would require continual maintenance of boundary fences.

Big game winter range would suffer without mechanical manipulation of crucial forage. Private landowners have been converting local natural range to farmed land, eliminating a significant portion of traditional forage for these animals. Without the ability to supplement winter feed by mechanical manipulation within the WSA lands, the elk herd would diminish by nearly 200 animals.

An inholding of 640 acres of state land would need to be acquired to maintain the integrity of the area. The Idaho Department of Lands has requested that an exchange be made of the inholding in any area that is designated wilderness.

### **Energy and Minerals Resource Values**

A Geology, Energy and Mineral (GEM) assessment report was prepared for the Sand Mountain WSA in 1983 (Geoexplorers International, Inc., 1983). Conclusions from the report are as follows:

None of the lands have been leased for geothermal resources and no mining claims for locatable minerals have been filed. All of the lands are leased for either oil and gas or are available for leasing under the simultaneous oil and gas leasing system. The WSA has low-to-medium potential for the development of oil, gas and geothermal resources.

There is no known potential for the development of metallic locatable minerals. The development potential for dune sand is rated high while the potential for developing volcanic cinders, pumice and lava building stone is medium to high. These areas readily available outside the WSA.

**Impacts on Resources**

The following comparative impact table summarizes the effects on pertinent resources for all the alternatives considered including designation or nondesignation of the entire Sand Mountain WSA area as wilderness.

**Table 4**  
**Comparative Summary of the Impacts by Alternative**  
**WSA ID-35-3 (SAND MOUNTAIN)**

ISSUE TOPICS	PROPOSED ACTION (NO WILDERNESS/NO ACTION)	ALL WILDERNESS ALTERNATIVE	PARTIAL WILDERNESS ALTERNATIVE
Impacts on Wilderness Values	<p>Naturalness degraded on 410 acres from vegetative manipulation and seeding projects, campground construction and livestock water developments. Solitude and primitive recreation eliminated by 4,000-5,000 visitor use days of ORV use on 21,100 acres during spring, summer and fall and on 5,300 acres in the eastern portion by 300-400 visitor use days snowmobiling. Primitive recreation and solitude maintained on western 15,800 acres by winter ORV closure. Big game winter habitat, proposed sensitive species and scenic and geologic values maintained by ACEC and SRMA management.</p>	<p>Long-term (beyond 20 years) protection of wilderness characteristics and supplemental values on 21,100 acres. Wilderness protection would benefit stable wildlife habitats, candidate species of tiger beetle and primrose and scenic and geologic values. Downward trend in big game habitat would stabilize populations below optimum levels.</p>	<p><b>PARTIAL WILDERNESS (6,560 acres)</b> Long-term protection of naturalness and supplemental values of candidate species of tiger beetle and primrose and scenic and geologic values. Solitude and primitive recreation enhanced partially but degraded by nearby ORV use.</p> <p><b>NO WILDERNESS (14,540 acres)</b> Naturalness degraded on 410 acres from vegetative manipulation and seeding projects, campground construction and livestock water developments. Solitude and primitive recreation eliminated by ORV use on 14,540 acres during spring, summer and fall but maintained during winter by ORV closure.</p>
Impacts to Threatened, Endangered and Candidate Species	<p>ORV use increases could cause individual mortalities for candidate species of tiger beetle and primrose but impact would be slight. Stable populations would result and status would remain unchanged over the long term.</p>	<p>Long-term habitat protection from ORV use for candidate species of tiger beetle and primrose. Populations remain stable and listing may or may not occur.</p>	<p><b>PARTIAL WILDERNESS/NO WILDERNESS</b>            Long-term habitat protection from ORV use on 6,560 acres for candidate species of tiger beetle and primrose. ORV use increases on 14,540 acres could cause mortalities but impact would be slight. Stable populations would result and status would remain unchanged over long term. Partial wilderness would have little benefit to population.</p>
Impacts to Recreational ORV Use	<p>ORV-related recreation enhanced with a considerable positive impact to recreation use. Total recreation use could increase 350% or to 19,250-23,350 visitor use days by the year 2006.</p>	<p>ORV-related recreation eliminated resulting in considerable impact. Visitor use would decrease as much as 1,100% with 16,450-20,500 visitor use days foregone. Local ORV recreationists would shift activity to other nearby dunes and out-of-state visitation would not occur to any great degree.</p>	<p><b>PARTIAL WILDERNESS/NO WILDERNESS</b>            ORV-related recreation enhanced with a moderate positive impact to recreation use. Total recreation use would increase 141% or to 8,050-9,400 visitor use days by the year 2006. Local ORV recreationists would shift activity away from partial wilderness to nearby dunes and out-of-state visitation would decrease.</p>

ISSUE TOPICS	PROPOSED ACTION (NO WILDERNESS/NO ACTION)	ALL WILDERNESS ALTERNATIVE	PARTIAL WILDERNESS ALTERNATIVE
Impacts on Local Economics (Sand Mountain WSA)	Total recreation expenditures would equal as much as \$1,448,400. This would represent a considerable beneficial impact to local businesses.	Total recreation expenditures would decrease by \$375,000. This would represent a considerable adverse impact to local businesses. Some businesses may have to close.	Total recreation expenditures would equal as much as \$503,820. This would represent a moderate benefit to local businesses.
Impacts on Big Game Winter Range	Habitat manipulation would maintain elk populations at 2,000 head, moose at 35-45 head and deer at 1,200-1,400 head. Optimum population goals could be met.	Without habitat improvement, an estimated decrease of 200 elk, 10-15 moose and 400 deer would result as well as a downward trend in habitat condition. Optimum population goals could not be met.	Habitat manipulation would maintain elk populations at 2,000 head, moose at 35-45 head and deer at 1,200-1,400 head. Optimum population goals could be met.
Impacts on Livestock Facility Development and Range Conditions	Range improvements could be constructed. Better distribution of livestock and a more stable range condition with increased quality and quantity of key forage grasses will result.	Range improvements would be constrained which would reduce capability of grazing systems to distribute livestock for optimum forage utilization. Forage grass vigor could decrease resulting in a downward trend in range condition.	Range improvements could be constructed. Better distribution of livestock and a more stable range condition with increased quality and quantity of key forage grasses will result.

## Local Social and Economic Considerations

Designation of the Sand Mountain WSA as nonwilderness would increase the number of 12-hour visitor days by 13,700 to 16,700 visitor days. This would lead to an increase in recreation expenditures of between \$849,800 and \$1,035,900. Thus, total expenditures for recreation activity in the WSA would be \$1,198,800 to \$1,448,400. This would convert to earnings of between \$475,800 and \$574,900 which would represent approximately three percent of the 1983 three-county retail trade earnings. The multiplier effect would increase total earnings to \$1,269,400.

The projected three percent increase in retail trade earnings would not have a significant impact on the three-county economy. However, business establishments in the immediate vicinity of the WSA are expected to benefit.

## Summary of WSA-Specific Public Comments

BLM's wilderness inventory and study were conducted with extensive public participation and public involvement was an important consideration in making wilderness recommendations. BLM solicited public involvement in the study phase through scoping meetings, a 90-day public comment period and three formal hearings on the Medicine Lodge Resource Management Plan/EIS (the Draft Medicine Lodge Wilderness EIS was part of the land use plan). Comments received during the inventory period and EIS scoping efforts were used to develop significant study issues and various alternatives for the ultimate management of those lands found to have wilderness value.

Intense opposition to any wilderness consideration of the Sand Mountain WSA began with the inventory and carried through the FEIS. The inventory process took over four years to complete and involved numerous comments, protests to decisions and appeals to the Interior Board of Land Appeals (IBLA). The following is a summary of the comments received throughout the process.

BLM's initial inventory decision was to identify the Sand Mountain WSA for further inventory evaluation. Twenty-two comment letters were received with 20 opposing wilderness consideration for the area and two favoring further consideration. Those favoring wilderness commented on the uniqueness of noncoastal dune landscape and the way the wind naturally erases evidence of tracks on the sand. Those opposing wilderness felt the need to retain the outstanding opportunities for motorized recreation on the dunes and claimed few opportunities for solitude or naturalness existed due to extensive surrounding development, farm operations and from physical and environmental aspects limiting primitive recreation. Concern for an economic loss to local businesses was expressed by the ORV enthusiasts and local businesses.

With strong opposition to wilderness, BLM proposed to drop the area from further consideration which prompted an appeal by The Wilderness Society. IBLA upheld the appeal and required BLM to continue with the inventory. The change in decision to conduct the intensive inventory brought numerous protests from supporters of off-road vehicle recreation. Sixty-four letters were received with 60 opposing inventory, two supporting and two with no opinion.

A second appeal from a local St. Anthony, Idaho, judge was filed with IBLA after the protest decision was made but IBLA later upheld the decision to continue the process. The judge had not shown sufficient evidence to support dropping the area from the inventory.

The intensive inventory was completed and BLM's proposed decision was to identify the Sand Mountain area as a WSA. Forty-four comment letters were received with 40 opposing the study of the area, two supported the decision and two had no comment. Further protests were received from off-road vehicle enthusiasts but the decision remained. Ten appeals were filed with IBLA but none provided adequate reasons not to conduct the study on Sand Mountain.

BLM completed the study and released the Draft EIS along with a nonsuitable recommendation for the Sand Mountain WSA. Nineteen letters were received on the wilderness portion of the Medicine Lodge RMP/EIS. Sixteen comments agreed with the no wilderness recommendation for the WSA, two disagreed and one had no opinion. During a scheduled hearing, one commenter agreed with the no wilderness recommendation.

Nine government agencies provided written responses to the Draft EIS/Resource Management Plan but did not comment on the WSA. These agencies are the Idaho Department of Water Resources, the Department of the Army, the Bureau of Mines, the U.S. Nuclear Regulatory Commission, the U.S. Forest Service, the U.S. Geological Survey, the U.S. Fish and Wildlife Service, the Environmental Protection Agency and the Department of Energy. No comments were received on the Final Medicine Lodge Wilderness EIS from government agencies.

