

CHAPTER 5

CONSULTATION, COORDINATION, AND PUBLIC PARTICIPATION

Development of the recommendations for the Big Lost/Pahsimeroi Wilderness Final Environmental Impact Statement has included an ongoing coordination and public involvement effort. Federal Register notices and news releases have announced all steps of the process to date, including the study schedule, notices of intent for preparation of the EIS, notice of availability of the EIS, notice of public hearings, and public comment periods.

Throughout the study, consultation and coordination has occurred with other federal agencies, state, county, and local governments, and the public. Additional consultation and coordination took place with the U.S. Fish and Wildlife Service (USFWS) and the State Historic Preservation Officer (SHPO).

Wildlife and vegetation inventories and consultation with the USFWS did not identify any threatened or endangered species in the WSA. Inventories and consultation with the SHPO during scoping determined that no cultural sites that would be eligible for nomination for listing on the National Register of Historic Places are known to exist within any of the WSAs.

Coordination with the U.S. Forest Service, Challis National Forest, has been ongoing throughout the development of this EIS. While no formal comments were received, informal contacts were made at the local level to determine the Challis National Forest's opinion of BLM wilderness proposals.

LIST OF PREPARERS

Loren Anderson prepared the Burnt Creek WSA wildlife material for the EIS. Loren was the district wildlife biologist at the Salmon District Office and is now the Lemhi Resource Area biologist. He has been a wildlife biologist for twelve years and was a range conservationist for three years. Loren has a B.S. in wildlife biology from Colorado State University.

George Babits prepared the geology and energy/minerals sections for the Burnt Creek WSA. George is the district geologist at the Salmon District Office. He has been with the BLM, the Bureau of Reclamation, and Soil Conservation Service as a geologist for ten years. He has a B.S. in geology and a B.S. in physical science from Washington State University.

John Butz wrote the sections covering Appendicitis Hill and White Knob Mountains WSAs. He started with BLM in 1974 in Carson City, Nevada, and has worked in the Salem, Oregon District, in the Oregon and Idaho State Offices, and in the Idaho Falls District as the outdoor recreation planner since 1977. He holds a degree in forest recreation management from Oregon State University.

Tim Carrigan assisted with the range section of the Burnt Creek WSA. Tim was with the BLM for 4 years as a range conservationist in the Salmon District's Ellis-Pahsimeroi Resource Area, and is now a helicopter pilot for the U.S. Army. Tim has a B.S. degree in range management and wildlife management from Humboldt State University.

Tim Carroll prepared the geology and minerals section for Appendicitis Hill and White Knob Mountains WSAs. Carroll joined the BLM in 1974 as a minerals specialist, and has been the district geologist in Idaho Falls for over 3 years. He has a B.S. degree in geology from the University of Missouri.

Rex Christensen, Ellis-Pahsimeroi Area Manager, was responsible for the Ellis-Pahsimeroi MFP wilderness recommendation on the Burnt Creek WSA. Rex has a B.S. in botany from Brigham Young University. He was with the BLM for 26 years, 17 of which have been as an area manager before retiring in 1985.

Rick Colvin acted as writer-editor for the final EIS. Rick has been with the BLM for five years as the Challis Resource Area outdoor recreation planner. He has a B.S. in resource recreation management and an M.A. in interdisciplinary studies, both from Oregon State University.

Glenn DeVoe contributed to the range sections for Appendicitis Hill and White Knob Mountains WSAs. He has worked in the Idaho Falls District as a range conservationist for 6 years. DeVoe holds degrees in soils and range management and agriculture economics from the Universities of California and Oklahoma State.

Brent Jensen, Big Butte Area Manager, was responsible for the Big Lost MFP wilderness recommendations on the Appendicitis Hill and White Knob Mountains WSAs. Jensen has a B.S. degree in range management from Utah State University. He has worked in the Las Vegas, Nevada District and has been an area manager in the San Miguel and Gunnison Basin areas in Montrose, Colorado. He was the Montrose District range management specialist before coming to Idaho Falls in 1978.

Robert McCarty contributed to the wildlife sections for Appendicitis Hill and White Knob Mountains WSAs. McCarty has a B.S. degree in range management/wildlife habitat from Washington State University. He has been with the BLM in the Idaho Falls District for 7 years.

David McGowan assisted in preparing the range section of the Burnt Creek WSA. Dave has been a range conservationist in the Salmon District for eight years. He has a B.S. in rangeland resources from Oregon State University.

Michael Vallance is the Challis-Mackay Resource Area forester. He wrote the forest resource section of the Burnt Creek WSA. Mike has a B.S. in forestry from Purdue University, and has been with the BLM for four years.

George Weiskircher is the Idaho State Office Outdoor Recreation Planner and also served as state office liaison for this EIS. George has been with the BLM for ten years, the past five in Boise. He has a B.S. in earth science from New Mexico State University.

Dave Wolf was team leader for this EIS. He directed the preparation of this EIS and prepared several sections. Dave has been with the BLM for six years. He has a B.S. in wildlife management and a B.S. in outdoor recreation, both from Colorado State University.

ENVIRONMENTAL IMPACT STATEMENT REVIEW

An intensive effort has been made to involve the public, other agencies, industry, and special interest groups. During preparation of the Big Lost and Ellis-Pahsimeroi MFPs, numerous meetings were held with individuals, interest groups, industry representatives, and Federal, State, and local agencies. Open houses were held in May (5/6/81 and 9/30/81), Arco (8/9/82) and Mackay, Idaho (9/1/82). A notice announcing the initiation of work on the Big Lost/Pahsimeroi Wilderness EIS was published in the Federal Register on February 22, 1983.

The Draft EIS was released for public review and comment on August 26, 1983. The formal comment period was open until October 27, 1983. Public hearings were held at Arco, Idaho (9/26/83) and Challis, Idaho (9/27/83). No individuals testified at either public hearing.

During the comment period, seventeen written comments were received. Comments were received from seven individuals, two energy companies, two from a conservation organization, four federal agencies, two State of Idaho agencies, and one from the Shoshone-Bannock tribes. No comments were received from the Governor's Office, Congressional representatives, State legislators, or local officials.

All comments that presented new data, questioned facts or analyses, and raised issues having a direct bearing on the adequacy of the EIS were used in making changes to the draft and/or given individual responses in this chapter. Responses are also provided for other comments considered to be of general interest to the readers. All public comments will be considered when making the final wilderness recommendations, regardless of whether they are printed or receive responses in this EIS.

Department of Agriculture

Soil Conservation Service
Forest Service

Federal Aviation Administration 17 111

Department of Transportation

Environmental Protection Agency 15 108

Federal Energy Regulatory Commission

Department of Energy 16 109

Department of the Air Force

State of Idaho Agencies

Department of Fish and Game 14 107

Department of Health, Welfare and
Environmental Services

Department of Lands

Department of Water Resources

Historic Preservation Officer 19 115

University of Idaho Extension Service

Idaho State Clearinghouse

Idaho Air National Guard 18 113

Department of Transportation

Organizations

Idaho Wildlife Federation

Idaho Cattle Feeders Association, Inc.

Tri-County Cattlemen's Association

Idaho Archaeological Society, Inc.

Idaho Conservation League

Natural Resource Defense Council

Western Environmental Trade Association

League of Women Voters of Idaho

Northern Rockies Chapter Sierra Club

The Institute of Ecology

Idaho Cattlemen's Association

Wilderness Society

Committee for Idaho's High Desert 1, 2 53, 64

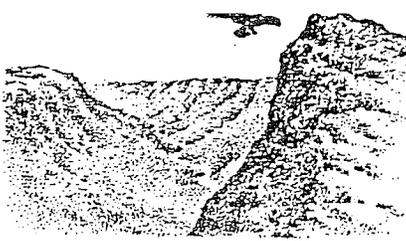
Industry

Rocky Mountain Oil & Gas Association		
Independent Petroleum Producers		
Idaho Mining Association		
Hunt Energy Corporation		
Amoco Production Company		
Arco Exploration Company		
Champion Building Products		
Conoco	11	103
Exxon Minerals Company, U.S.A.		
Texaco, Inc.		
Ronan, Inc.	12	104
Union Oil Company of California		
Superior Oil Company		

Individuals

Grazing permittees		
District mailing list (on file)		
Peter Bowler	3	76
Randall E. Morris	4	87
Dan Peterson	5	88
Carol Kriz	6	90
Dale Asplund	7	92
Jerry Jayne	8	94
Howard Emry	9	97
Shoshone-Bannock Tribes	10	101

COMMENTS AND RESPONSES



COMMITTEE FOR IDAHO'S HIGH DESERT

Oct. 25, 1983

EAST IDAHO CHAPTER

392 Moonlite Drive, Idaho Falls, ID 83402

Mr. Kenneth Walker, District Manager
Bureau of Land Management -- Salmon District
P.O. Box 430
Salmon, ID 83467

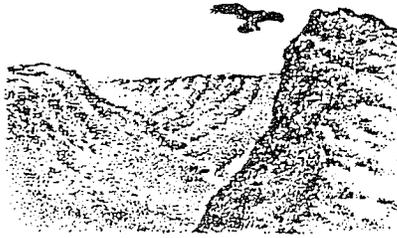
Dear Sir:

Thank you for the opportunity to comment on the Big Lost/Pahsimeroi Wilderness Draft Environmental Impact Statement. Please consider the following comments and suggested boundaries in preparing the final document.

I must take immediate exception to an unfair interpretation by Mr. Don Watson of the Idaho Falls BLM office (as reported in the Post-Register) claiming that the total absence of testifiers at the Arco and Challis hearings amounts to broad-based, popular support for the BLM's preferred alternative. Sentiments expressed to me by the membership of CIHD's East Idaho Chapter run distinctly to the contrary. Although the Chapter is not as yet very well organized, due to preoccupations with Senator McClure's wilderness actions, I did survey the wishes of the other ten members by phone (reaching eight). Half stated outright support for the all-wilderness alternative, feeling that BLM lands of marginal and poor wilderness quality were dropped before this phase of the review. The rest indicated a desire that more of Burnt Creek and at least some of Appendicitis Hill be recommended to better protect foothill-type wildlife habitat, especially winter range. I tried to achieve a consensus with the attached boundary proposal, while still taking into account peripheral manageability. I believe the result is worthy of serious, formal examination in the final EIS. See attached map.

The detailed boundaries were primarily derived from topographic maps and from my own field efforts. Burnt Creek was investigated by driving to Mahogany Ranger Station and up Long Creek road, and by reviewing my slides from the tops of the Donkey Hills and Mount Borah. Appendicitis Hill was researched from Antelope Creek road and Newman Canyon road, by hiking all of Rocky Canyon, and by hiking the ORV path up an unnamed canyon in sections 14 and 23 of the northeast WSA. The White Knob Mountains WSA was scouted from Antelope Creek road and by hiking cross-country from the road to Richardson Spring and down the jeep road to Mountain Spring. I was personally surprised at the beauty of the outcroppings in all areas visited, and didn't encounter another soul when off a main road.

- 1-1: Under either the All Wilderness or Partial Wilderness Alternatives, the last two miles of the Burnt Creek Road would, indeed, be closed. This was alluded to on pages v. and 38 in the DEIS. It is implicit in the fact that ORVs would be eliminated from the designated wilderness portion under each alternative.
- 1-2: Note that the proposed action for the Burnt Creek WSA has changed from the DEIS to this FEIS (see explanation on page 1).
- 1-3: We agree that development on ridges is unlikely in the near future. We do not see any particular justification for the CIHD's boundary. The logical conclusion to their argument would be the All Wilderness Alternative which would protect all ridges in the WSA. (The other six CIHD member comments in support of the CIHD proposal also recommend the All Wilderness Alternative for the Burnt Creek WSA.)
- 1-4: The road leading to Richardson Spring was identified as a road during the wilderness inventory and forms part of the WSA's boundary. Simply closing part of it does not solve all of the problems or difficulties with managing the area as wilderness. There are five other vehicle access routes into the area and boundary identification problems exist along private, State and Forest Service land.
- 1-5: The BLM's resource analysis during planning for this EIS did not identify cultural resource values which would be significantly impacted by either designation or nondesignation of the WSA as wilderness. Consultation with the SHPO did not reveal any sites within the WSAs which would be eligible for nomination on the National Register of Historic Places. For these reasons, a discussion of cultural resources was not needed nor appropriate.



COMMITTEE FOR IDAHO'S HIGH DESERT

East
Idaho
Chapter

~~PO BOX 463 BOISE IDAHO 83701~~

Advantages of CIHD-proposed boundaries for reducing wilderness conflicts inherent within the all-wilderness alternative should be obvious. However, several items warrant special attention.

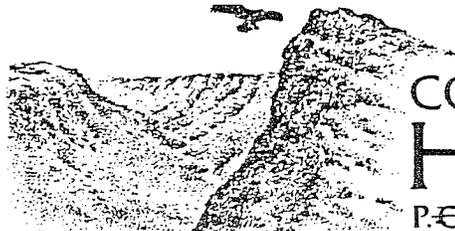
1 (1) The last two miles of Burnt Creek road should be closed to reduce wildlife impacts (mainly riparian) and to provide a better guarantee of solitude and quiet at Burnt Creek Lake. (DEIS intentions are most unclear in this regard.) The wilderness boundary coincides with where Burnt Creek Canyon becomes sufficiently narrow for a vehicle barrier to be practical, effective, and inexpensive. Please note that volunteer labor could be arranged to help construct such a barricade.

1-2
3 (2) CIHD Burnt Creek boundaries would protect several ridges excluded from the BLM's proposed action. Any conspicuous alterations to the natural landscape on these ridges would have a profoundly adverse impact on scenic views from the Rock of Ages (a popular destination point) and from part of the proposed Borah Peak Wilderness. Such development is admittedly unlikely for the near future, but wilderness planning is essentially for eternity.

1-4 (3) The jeep trail to Richardson Spring in the White Knob Mts WSA is used infrequently at most, and could be closed without undue difficulty above Mountain Spring. Thus, disqualifying this WSA from wilderness recommendation largely on grounds of manageability cannot be justified.

1-5 (4) ORV paths up Rocky Canyon and The Appendicitis Hill unnamed canyon are recommended for closure, although both appear used by hunters, due to a combination of archaeological features and habitat for several species of raptor. I didn't have adequate time for thorough site surveys of either canyon (I'm not a professional archaeologist, anyway.), but illegal trenchings for artifacts were common--albeit generally small in size. Several pictograph panels are located in both canyons, and are surprisingly free of spray paint. However, I found two places (one in each canyon) where large panels had been removed with hammer and chisel or a pickaxe. Many painted chunks were discarded by the looters and left lying, since they contained only partial symbols after the fracturing. Note that the East Idaho Wilderness DEIS thoroughly examined potential benefits of roadless management.

- 1-6: It is probable that what you saw was indeed a Peregrine falcon. However, it is considered to be a rare sighting and was probably a bird in transit to more suitable habitat. Neither BLM inventories nor consultation with the U.S. Fish and Wildlife Service show the existence of nest sites or nesting pairs of peregrines in the WSA.
- 1-7: Boundary adjustments were considered for the Appendicitis Hill WSA in the Big Lost MFP. At that time, a decision was made not to analyze further a boundary adjustment because of lack of manageability. While this is still considered valid, because seven of the sixteen comments suggested a partial alternative for Appendicitis Hill, the FEIS has been revised to add a new alternative for WSA 31-14 (page 7).



COMMITTEE FOR IDAHO'S HIGH DESERT

East
Idaho
Chapter

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-5 for preserving archaeological sites at the Black Canyon BLM WSA, where apparently an Area of Critical Environmental Concern recommendation will be made in the FEIS. I still feel a wilderness is more appropriate, but at least the vandalism problem was decently addressed in that document. The Big Lost/Pahsimeroi DEIS is notably deficient in this regard for Appendicitis Hill.

-6 I spotted eagles and smaller raptors in the unnamed canyon, which is full of potential nesting sites due to the eroded limestone, but was unable to get sufficiently close for identifications. However, I had the pleasure of leisurely watching a male peregrine falcon at two places in Rocky Canyon, within a single afternoon, from as close as forty feet. The dark head was quite prominent, and the dark "armpit" features on prairie falcons were definitely absent. The approximate 30-inch wingspan eliminates the smaller pigeon hawk (merlin) as a possibility. Unfortunately my slides, obviously taken from underneath the falcon, show only the outline and are not suitable for identification. I've alerted Eddie Chew of the Audubon Society for confirmation by an experienced bird observer, but he's not visited Rocky Canyon as of this writing.

Now that the CIHD boundaries have been explained and justified, more general arguments can be advanced as to why the Chapter feels more than one-seventh of the total acreage should be recommended for wilderness. This can be accomplished while refuting most of the BLM anti-wilderness contentions contained within the DEIS at the same time. Again, manageability problems are addressed by our boundary proposal.

FOR APPENDICITIS HILL/WHITE KNOB MOUNTAINS

1-7 (A) "Quality of the natural characteristics is low due to numerous unimproved vehicle ways and livestock watering sites."
I did not find this to be the case at the White Knob Mtns WSA with the exception of the jeep road already discussed, which would revegetate in a short time after closure. Boundary adjustments at Appendicitis Hill per our proposal would essentially remove this problem, though the two canyons mentioned would have to be closed to traffic. Topographic screening at Appendicitis Hill is more helpful than our usual

- 1-8: Reference to diversity in the National Wilderness Preservation System has been deleted from the FEIS.
- 1-9: Reference to opportunities for primitive recreation within a day's driving time (5 hours) from major population centers has been deleted from the FEIS.
- 1-10: Reference to balancing the geographic distribution of wilderness has been deleted from the FEIS.
- 1-11: Actually, very little mountain mahogany thinning would be allowed with the boundary suggested (the Partial Wilderness Alternative). Controlled burning is not a feasible alternative if the desired result is increased forage production (see pages 28, 31. and 33).



3 (B) "The sagebrush steppe ecosystem (M3110-49) is represented in the Red Rocks Lake National Wildlife Refuge Wilderness Area."

Frankly, I don't see much similarity between central Idaho foothill/transition areas and the flat marshes and grassland hills on the other side of the Continental Divide near Red Rocks Lake. The Bailey-Kuchler classifications are clearly too crude and coarse for meaningful use in this context. Moreover, who says a single representative of an ecosystem type is sufficient to fulfill National Wilderness Preservation System needs?

-9 (C) "Wilderness designation of both WSAs would increase primitive recreation and solitude acreage to residents of Boise, Idaho by only 1%."

So what? This logic could be used to systematically eliminate every sub-million-acre wilderness candidate in Idaho, no matter what wilderness values were involved. The 5000-acre cutoff for "island" wildernesses is clearly established, and the value of a small wilderness is definitely demonstrated by the Craters of the Moon Wilderness.

10 (D) "The WSAs would not help balance geographic distribution of wilderness. Instead, they would tend to concentrate it in central Idaho."

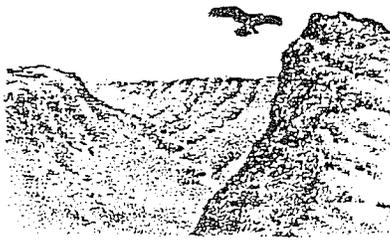
These two WSAs are relatively convenient to residents of Idaho Falls and Pocatello. If national forest wilderness proposals by the Idaho Fish & Game Dept. and by Governor Evans are any indication, there won't be an east Idaho wilderness, excepting the Craters, and possibly the Great Rift and Borah Peak, none of which have much wildlife significance.

1 (E) "The no wilderness alternative permits mechanical manipulation of vegetation to improve mule deer habitat in WSA 31-14 Appendicitis Hill."

Some of this would be allowed with our boundaries. Other such areas could be handled with controlled burns. Possibilities for controlled burns should definitely be mentioned, because the implication is made that wildlife habitat improvement fundamentally conflicts with wilderness.

1-12: See Responses 1-1 and 1-2. The Short Creek and Burnt Creek Roads are constructed roads located outside of the WSA boundaries.

1-13: You make the argument that low ORV use in a nonwilderness translates to minimal ORV manageability problems in designated wilderness. We believe that ORV use at any level would be a management problem in designated wilderness.



FOR BURNT CREEK

(A) "The Burnt Creek and Short Creek roads intrude far into the WSA... Vehicle use... would reduce the solitude opportunities for wilderness users to less than outstanding by allowing outside sights and sounds to intrude into the wilderness environment..."

L-12

First, Short Creek road cannot be used very often, judging by the surface. Use of Burnt Creek road and the impacts thereof would both be substantially reduced by closure of the last two miles. As stated earlier, preventing scenic alterations to the ridges should be the primary consideration, since relatively few visitors will hike these ridges to be offended by these infrequent sights and sounds.

(B) "In order to manage the entire WSA as wilderness, Fencing of the Burnt Creek and Short Creek roads as well as most of the WSA's northern and eastern boundaries would be required to control access since natural barriers do not exist."

-13

Maybe, but examination of our boundary proposal will show that a larger partial alternative can be accommodated with a small increase in boundary fencing. Besides, fencing presupposes serious conflicts with frequent ORV visitors. This is not a high-use area, and conflicts are likely to be occasional trespassing, at worst. Fencing could be provided where needed when a noticeable problem materializes. I seriously doubt that 30 miles of fence would be required to protect the whole WSA, in practice.

Scott Poyer

Scott Poyer, President
East Idaho Chapter
Committee for Idaho's High Desert

LAND STATUS

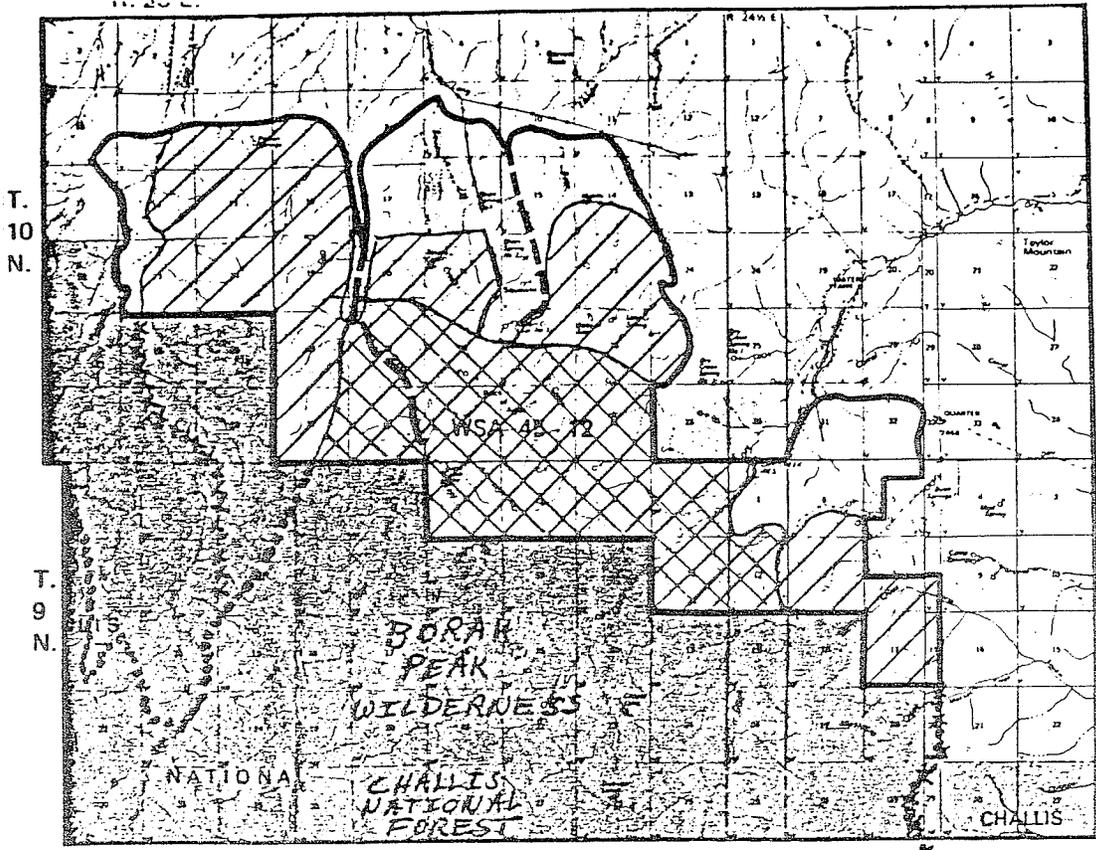
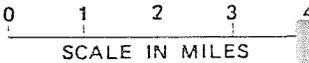
- PUBLIC LAND.....
- STATE LAND.....
- U.S. FOREST SERVICE LAND.....
- DEAD END ROADS.....
- WILDERNESS STUDY AREA BOUNDARY.....
- ALL WILDERNESS ALTERNATIVE.....
- NO WILDERNESS ALTERNATIVE.....

Forest Service - proposed wilderness boundary

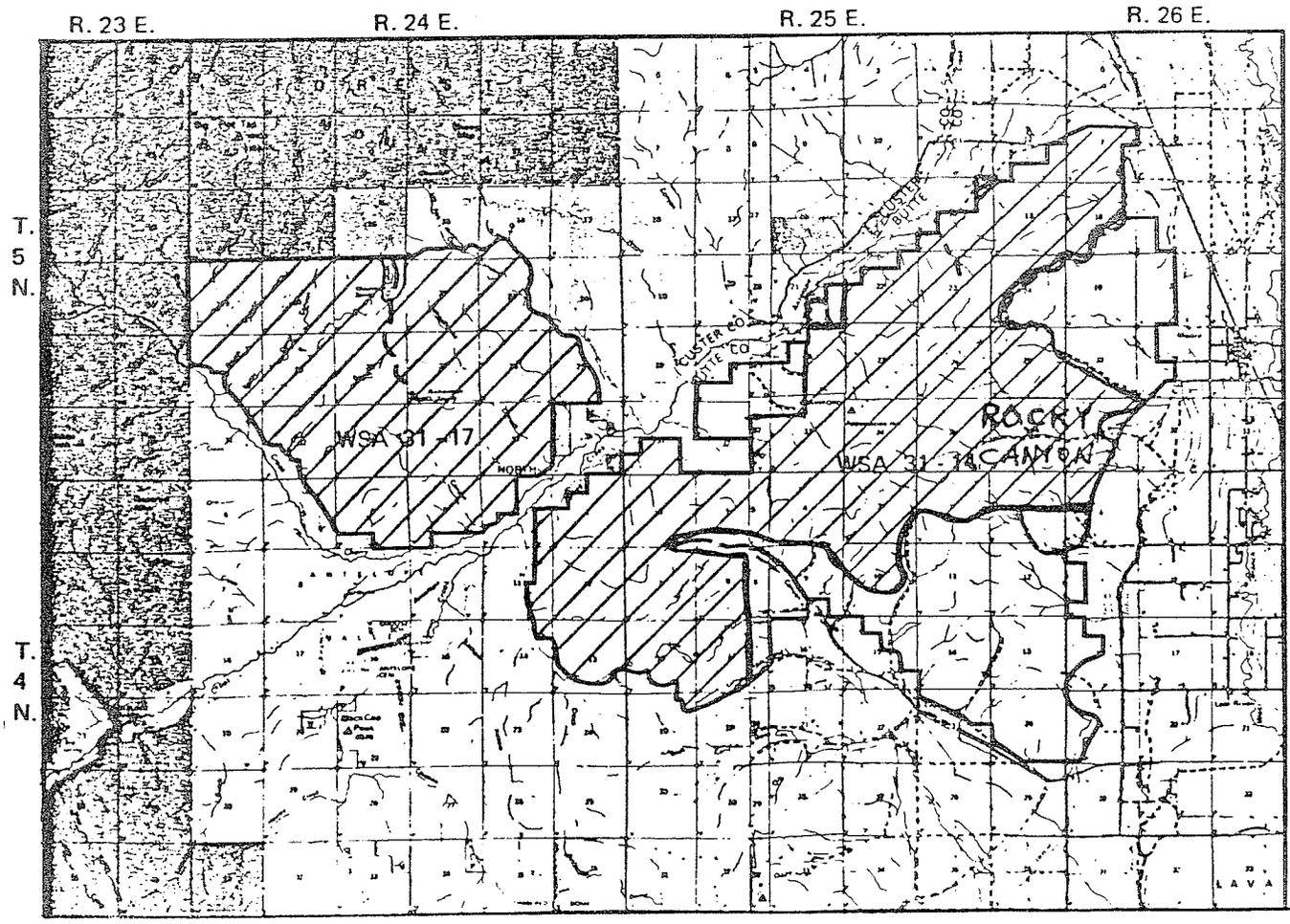
conservationists' Borah Peak boundary xxx

BLM - recommended wilderness

CIHD - proposed wilderness



BURNT CREEK WSA 45 - 12



WHITE KNOB MOUNTAINS WSA 31 - 17

APPENDICITIS HILL WSA 31 - 14

2-1: The California RARE II EIS and this EIS are not at all similar. The RARE II EIS attempted to analyze a large number of areas in the aggregate with little attention given to specific area analysis. The Big Lost-Pahsimeroi EIS analyzes the impacts of specific alternatives for each WSA individually. As stated on Page 7 of the DEIS, the overall proposed action is a combination of proposed actions for the individual WSAs. The FEIS has been extensively reorganized with very little reference to an overall proposed action, to more clearly show that alternatives analyzed were formulated WSA-specific, and that there was a range of alternatives for each WSA. Also, see page 8 in the FEIS for a discussion of alternatives considered but dropped from analysis.



COMMITTEE FOR IDAHO'S HIGH DESERT

P.O. BOX 463 BOISE, IDAHO 83701

October 25, 1985

Mr. Kenneth G. Walker,
District Manager
Salmon District Office
Bureau of Land Management
P.O. Box 430
Salmon, Idaho 83647

Dear Mr. Walker:

The Committee for Idaho's High Desert is a statewide, grassroots organization dedicated to protecting Idaho's outstanding desert wildlands, waters, fish and wildlife, and other resources. On behalf of the Committee and its members statewide, I would like to offer the following comments on the Draft Big Lost/Pahsimeroi Wilderness Environmental Impact Statement.

GENERAL OBSERVATIONS

Overall, we are very disappointed with this document and its recommendations. It lacks the hard, specific information necessary to properly evaluate the resources, and effects on these resources, of the proposed action and the other alternatives examined; there is a definite lack of factual information. Much of the rationale for justifying the proposed action is highly questionable, such as the statement that 85% of the study acreage should not be protected as wilderness "because it would only add 1% to the wilderness acreage available to Boise residents (page 7). The general tone of the DEIS, as reflected in the significant issues developed in the study process, is decidedly biased against wilderness.

Range of Alternatives

We believe that the DEIS presents a range of alternatives which is legally inadequate in light of the California vs. Block decision. In this case (690 Fed 2d 753), Judge Karlton ruled that the Forest Service failed during RARE II to evaluate a legally adequate range of alternatives, and that as a result the Forest Service had violated the National Environmental Protection Act (NEPA). We believe that the range of alternatives presented in the Draft Big Lost/Pahsimeroi Wilderness EIS is clearly inadequate, based on this decision.

During RARE II, the Forest Service examined 10 alternatives, nine of which designated less than 36% of the possible wilderness acreage as wilderness, and one of which designated 100% to wilderness. As indicated above, the Court found that this was not a legally adequate range of alternatives, and that the Forest Service was required to examine partial wilderness alternatives which examined wilderness designations in the range from 36 - 100%. The Big Lost/Pahsimeroi DEIS fails to meet even the Forest Service's standards. There are only three alternatives, one which designates 0% of the study acreage as wilderness, one which designates only 14.6%, and one which designates 100%.

We believe that to meet NEPA requirements, the FEIS is required to examine additional partial wilderness alternatives. We particularly believe that you should examine additional boundary proposals for Appedicitis hill, because the impacts of potential ORV intrusion are largely confined to the southern periphery of the WSA. We recommend that the following additional alternatives be fully examined in the FEIS:

- 2-2: See page 8 in the FEIS for a discussion of alternatives considered but dropped from analysis (also see Response 1-7).
- 2-3: See Response 1-8.
- 2-4: See Response 1-9.

2-2

1) A moderate wilderness proposal consisting of the northern two-thirds of Appendicitis Hill and all of the Burnt Creek Wilderness Study Area. This alternative would protect as wilderness 31,680 acres of study lands, which is 55.7% of the total study acreage; and

2) A moderate-high alternative which would designate as wilderness all of Burnt Creek, the northern two-thirds of Appendicitis Hill, and the White Knob Mountains WSA. This would protect 41,630 acres, which is 75.3% of the total study acreage.

We strongly urge you to reconsider your preferred action, after considering the two alternatives outlined above. We believe the public interest would best be served by recommending the All-Wilderness Alternative as the proposed action, given the resource values and alternatives at stake in the WSAs under study. If you cannot select this alternative, at a minimum we urge you to select alternative 1) outlined above, the Burnt Creek-Appendicitis Hill proposal. We believe this is a balanced, reasoned alternative which will protect the Borah Peak ecosystem and the core of Appendicitis Hill, but also be a manageable alternative as well.

2-3

Representation in the National Wilderness Preservation System

We strongly disagree with your assessment that one representation of an ecosystem in the National Wilderness Preservation System is enough. The decision not to recommend additional wilderness in the sagebrush-steppe ecosystem because there already is a representation of this habitat type in the Red Rocks Lake National Wildlife Refuge is extremely short-sighted, and setting us up for the potential of a catastrophic event which would wipe out our entire representation of this habitat type.

The Bailey-Kuchler habitat classification system was developed for forest lands, and gives a rather cursory attention to desert and grassland communities. The system was not meant to be a determinant of the suitability or nonsuitability of specific areas for wilderness, but a general guide for BLM to assess the breadth of ecological diversity in wilderness areas. The adequacy of this classification system for desert habitats has been seriously questioned; this is evident by the fact that the Oregon BLM office is using the Oregon Natural Heritage Program classification system in their analysis of the ecological communities in the WSAs. We would like to request that, in the final EIS, you do a similar assessment using Dr. Minura Hironaka's habitat classification system for southern Idaho shrublands. This, we believe, would give a far more accurate assessment of the resources and values of these WSAs, and make possible a more meaningful assessment of the similarity between the WSAs and the existing wilderness in Montana. As stated above, in no case is there justification for excluding an area from wilderness protection simply because there is already an example of that habitat type in the Wilderness System.

2-4

Opportunities for recreation for Boise-area residents

We are amazed at your justification for non-wilderness for most of these WSAs on the basis that it would only increase the acreage available for wilderness recreation for Boise-area residents by 1%. This is an absurd criteria for evaluating wilderness characteristics! The WSAs should be evaluated on their own merits and characteristics, not on a pro-rating of total acreage in a given area.

Although the WSAs are only a potential 1% of the wilderness acreage available to metro Boise residents, they are some of the only areas within the Boise

2-5: The scoping and issue identification processes (see page 2 FEIS) derive their input largely from comments received from the public and other governmental agencies. The issues identified in the Draft EIS were a reflection of the comments BLM received. No bias towards any one viewpoint was intended.

We were, however, prompted by this and other comments to review the issues section of the EIS. This review resulted in a major rewriting of the issues section to clarify and more concisely define the issues (FEIS, page 2). At this time we also added an issue addressing impacts on wilderness values.

We agree with your statement concerning exchange of State inholdings in designated wilderness. This has been dropped from consideration in the FEIS.

In regards to your suggested issues:

1. After reviewing the actions which could occur in the WSAs if not designated as wilderness, BLM wildlife biologists concluded that no significant impacts to wildlife would occur. The possible actions are few in number, small in scale, scattered and in the case of range improvements similar to existing improvements. See page 5 for issues identified during scoping but not selected for analysis. Herbicide spraying was not mentioned anywhere in the DEIS nor is it mentioned in the FEIS.

2. There are no known threatened, endangered, rare, or sensitive plant or animal species inhabiting the WSAs (See Response 1-6 and page 6 of the FEIS).

3. Analysis of the impacts of nondesignation on wilderness values in each WSA is discussed in the FEIS.

2-6: Impacts to wildlife was not included for analysis in this FEIS (see page 6).

It is anticipated that logging would occur only on 300 acres in the Appendicitis Hill WSA, not over all the stands of commercial forest. Harvesting any of the remaining commercial forest is not economically feasible and trends in the industry indicate it will remain uneconomical in the foreseeable future.

Herbicide spraying was not mentioned in either the DEIS or FEIS as a method of sagebrush control. Prescribed burning is the most accepted method to control sagebrush. Prescribed burning can occur in designated wilderness as well as nonwilderness.

2-7: See Response 1-13.

driving circle which could be protected as wilderness within the Middle Rocky Mountains Sagebrush-steppe ecosystem. The combination of Bailey-Kuchler and zone of travel makes these areas unique, and even more valuable because the Idaho Falls District has already made non-wilderness recommendations for all the WSAs within this same habitat/driving zone. These areas also have great recreation and solitude values in and of themselves, which is a significant attribute to the metro Boise area.

Commodity bias in the DEIS

Throughout the DEIS, there is a persistent and pervasive bias towards the production of commodities and against the protection of wilderness values. This is evident most clearly in the "Significant Issues" identified on pages 5 and 6; for example, although the wildlife section includes discussion on the "ability to thin overgrown mountain mahogany thickets", it nowhere discusses the positive value wilderness has on many wildlife species, particularly in areas where brush control or logging are contemplated. There are no issues identified which examine what the impacts of non-designation will be on wilderness recreation, solitude, or other wilderness values. All the issues identified are ones which intrinsically oppose wilderness designation.

Some of the issues identified appear more significant than we believe they in fact are. For example, the DEIS (page 5) identifies access to State lands a significant issue, although there is a standing State policy that it will seek to exchange lands within designated wilderness areas for lands outside. This issue is one which can be easily dealt with in terms of policy, as it has in all other BLM DEISs relating to Wilderness.

We would like to suggest additional issues which need to be identified:

2-5

1. What will the impact of non-designation be on antelope, sage grouse, and other wildlife species? What will the impacts of herbicide spraying and other proposed projects be on fish and wildlife within the WSAs?
2. Are there any rare, threatened, or sensitive plant or animal species or community types within the WSAs? If so, what would the impacts of proposed developments be on these?
3. What will be the impacts of proposed activities within the WSAs be on wilderness qualities including (but not limited to) primitive recreation, solitude, naturalness, and special features?

SPECIFIC COMMENTS

2-6

Table 1 Impacts to Other Resources (Wildlife) We completely fail to understand how the table could show the Nonwilderness alternative as having No Impact on wildlife, particularly given the other resources affected. What would be the impact of logging on 1,279 acres be on wildlife, particularly old-growth dependent bird and mammal species? What would the impact be of herbicide spraying for brush control be on the winter range (or other seasonal range) for antelope, mule deer, and other species? How about the wildlife impacts of energy and mineral development?

(Recreation) Same concerns as above. How would development of oil and gas, mineral, logging, and range improvements impact primitive and unconfined recreation? Solitude? Special features? Certainly, there will be some impact!

2-7

ORV Use - A significant part of the justification for excluding most of Burnt Creek and Appendicitis Hill is the "management problem" of excluding ORV use from the areas. However, throughout the document the statement is made that

- 2-8: See Response 2-6.
- 2-9: The WSA as a whole appears natural. This is a requirement to get into study status. The area contains reservoirs and vehicle ways which have site-specific impacts on naturalness and these impacts are dispersed in such a way that a wilderness user would constantly encounter them.
- 2-10: Rehabilitation through wilderness management techniques of a few minor imprints would be reasonable. However, rehabilitating numerous imprints distributed throughout the Appendicitis Hill WSA is not considered reasonable and would cause future management difficulties.
- 2-11: See page 6.
- 2-12: See Response 1-8.
- 2-13: See Response 1-8.
- 2-14: The impacts on deer and elk winter range from range improvements would be negligible (see page 6 in the FEIS).

Hand trimming mountain mahogany would not be feasible because of the intensive labor involved. Further, tree cutting of any kind would not be allowable in designated wilderness (see pages 31 and 33 in the FEIS).

Impacts of sand and gravel extraction are discussed on pages 30 and 33 of the FEIS.

- 2-15: BLM inventories did not reveal any threatened, endangered, rare, or sensitive plants within the WSAs. Therefore, this was not an issue analyzed in this EIS.

Description of Proposed Action: Burnt Creek - We concur with your statement "The recommended suitable area complements the U.S. Forest Service's adjacent Borah Peak RARE II area (page 7)". However, we believe this applies to the entire Burnt Creek WSA, not just the portion recommended suitable. The current ORV use is low, and even without major topographic barriers, we believe fencing for a mile or more across the way boundary, accompanied with obliteration of the way, would effectively allow this area to be managed, without major problems.

- 2-8 Cumulative Impact Table - Forest Resources - the table lists the commercial timber harvest which would be foregone if the all-Wilderness alternative is adopted, but there is no discussion of the potential impacts of logging on wildlife, scenic values, recreation, watershed, and wilderness characteristics. Such discussion should be incorporated in the FEIS.
- 2-9 Page 14 - there is no documentation of the quality of natural characteristics being low due to numerous ways and watering sites. What is the density of ways? How does this compare to other WSAs in Idaho and elsewhere? Most important, does the area meet the naturalness criteria BLM used in identifying WSAs? Obviously, it does, which means it meets Congressional standards for naturalness.
- 2-10 Had the evaluation of WSAs been completed a century ago, we would have had the luxury of choosing from many pristine sites. We simply don't have that opportunity now, which is why stock watering ponds, etc. are allowable uses under the wilderness act. With proper management, ways can revert to good-quality grasslands, as can watering sites. We do not believe that this is a justifiable criteria for making a non-wilderness recommendation.
- 2-11 Page 16 - wildlife values. Numerous wildlife values are noted in the WSAs, including concentrations of chukar partridge and raptors and booming/brood rearing areas for sage grouse. What will be the impacts of range improvements, oil and gas exploration and development, and other proposed activities on these wildlife species and areas? What will be impacts on crucial elk and deer range?
- 2-12 Page 16 - ecological diversity: at present, there are no -dministratively endorsed Forest Service wilderness areas in Idaho, due to the recent RARE III decision. Hence, the DEIS should not ascribe any potential wilderness protection to ecosystems represented in the old FS recommendations.
- 2-13 Page 17, Table 3 - the comments above apply. Also, the FEIS should note which of the WSAs listed in the Table have been recommended non-suitable by BLM or other administering agency (including areas in Idaho such as Corral-Horse Basin, Hawley Mountain, and others). Checks should be made for areas out-of-state as well. The final chart should give, both in total acres and percentage of study acreage, the preliminary suitable/nonsuitable acreage within this limited ecosystem type (as shown by the WSAs listed in Table 3).
- 2-14 Pages 22,23 - range improvements: what will be the impacts of brush control projects on the deer and elk winter range in the WSA if the area is not protected as wilderness? What non-chemical options exist for thinning mountain mahogany? Is hand-trimming an option? What are the problems and benefits associated with controlled burns, and is this a viable option? If not, why not? What would be the impact of sand and gravel extraction on wildlife, recreation, and solitude?
- 2-15 Rare plants - nowhere in the DEIS is there any discussion of rare or sensitive plant species, as identified by the Idaho Natural Areas Coordinating Committee. Has there been any rare plant inventory work done within the WSAs? What plants on the INACC list are found or likely within the WSAs? What would be the impact

- 2-16: The primary recreation activity occurring in all three WSAs is big game hunting. Because big game populations would not be affected, hunting would not be affected. Impacts to aesthetics are analagous to impacts to the wilderness values of naturalness and are discussed throughout the FEIS.
- 2-17: See Response 1-10.
- 2-18: This has been deleted from the FEIS.
- 2-19: Admittedly, vehicle use in the WSAs is currently low. Vehicle use at any level in a designated wilderness is inappropriate and creates management problems.

on these species of sand and gravel extraction, herbicide spraying for brush control, range improvement projects, logging, or other activities possible within the WSAs if they are not protected as Wilderness? Would wilderness designation enhance the survival of these species?

2-16 [Page 24 - recreation: what is your justification for a "No impact" statement for the No Wilderness Alternative? What would the impact of sand and gravel extraction, spraying projects, etc. be on aesthetics and other elements of recreation use?

2-17 [Page 28 - geographic distribution of wilderness (also mentioned elsewhere in text): We fail to see how you can consider designation of wilderness in these areas to be further concentration of wilderness in central Idaho. These areas are on the margin of the Snake River Plain or in the Pahsimeroi Valley, areas with ready road access from southern Idaho population centers (unlike the River of No Return or other areas more traditionally thought of as "Central Idaho").

Page 29 - Primitive and Unconfined Recreation: we disagree with the assertion that recreation opportunities for the White Knob Mountains are diminished because the WSA lacks a significant feature which would serve as a focal or destination point for visitors. The overall scenic and wilderness values of the area itself are of value, and the diminishing amount of wilderness makes this area of increasing value.

Page 32 - hunting: Surveys by the Idaho Department of Fish and Game have shown a majority of hunters believe there are too many roads in Idaho, and that a "quality" hunt is as important, or more so, than vehicle access. It is possible that closure of ways would enhance wildlife populations or hunting opportunities, increasing the value of the area to hunters.

2-18 [Page 32 - RARE II: as mentioned earlier, the Forest Service is in the process of re-studying lands for their wilderness characteristics. It is not correct to state that the Challis National Forest has dropped the contiguous Forest land from wilderness study.

Page 33 - Range: It should be noted that the Colorado Wilderness Act allows salting and other traditional range activities to be undertaken by motorized vehicle if there are no reasonable alternatives and it has traditionally been done in such a manner.

2-19 [Page 38 - Borah Peak: As mentioned earlier, the DEIS states that vehicle use is low, but then claims that vehicle use creates a significant management problem which is a major reason for not classifying the entire WSA as Wilderness. This basically doesn't make sense. If vehicle use is not a problem now, we can't see why BLM should assume it will be an insurmountable problem in the near future. The FEIS should explain in detail why this is the case, and why moderate amounts of fencing combined with rehabilitation of ways would not be sufficient to manage vehicle use.

Fencing is allowed within a WSA; in addition, much of the potential fencing necessary would be on the WSA boundary, which would not be in any way a diminishing of wilderness values within the WSA. Road closures were not even considered in the DEIS, and should be carefully examined in the FEIS for the Burnt Creek and Short Creek roads. Again, even if they are not closed, the fences would be on the WSA boundary, and not within the Wilderness. (Desert hikers are used to crossing fences!)

We strongly believe the all-wilderness alternative is the best alternative in terms of enhancing a Borah Peak Forest Service wilderness (which is one of

- 2-20: Impacts of commercial thinning on 300 acres in the Appendicitis Hill WSA are discussed on page 26 in the FEIS. Timber harvest was not an issue for analysis for the other WSAs (see page 6).
- 2-21: The roads are not included in the partial alternative thereby removing the manageability problem of controlling vehicle access onto lands along the roads.
- 2-22: The BLM analysis is based on our best estimates of projected future activities. The CIHD would appear to favor a worst case analysis which assumes that all potentially degrading activities will at some time occur.
- 2-23: The FEIS discussion of the impacts of development activities on wilderness values has been expanded from the DEIS (see Chapter 4).

Mr. Kenneth G. Walker, October 25, 1983, page 6

the least controversial Forest Service areas, and the most likely to be designated in the near future. Burnt Creek would provide low-elevation deer and elk range and otherwise help create a more viable Borah Peak Wilderness.)

Since vehicle use is low, we don't see why outstanding opportunities for solitude and primitive and unconfined recreation would be lessened by the Burnt Creek and Short Creek roads, especially if there is a closure to use by the public. Again, a road closure or partial closure (open to permittees only, on a restricted as-needed basis) should be examined. Similar schemes are being considered on the Boise and Shoshone Districts. An intermediate fencing scheme also should be examined; if vehicle use is low, it doesn't seem likely that the entire boundary would need to be fenced.

Fences don't significantly affect recreational opportunities, especially if they are properly designed and located. They are much less an impact than pipeline development, mining, logging, or other possible uses; given the alternatives, recreationists would very likely prefer fences to development which would destroy opportunities for solitude and primitive and unconfined recreation, as well as the aesthetics of the area.

2-20 [Page 41 - Standard No. 3: Although Table 45-12 mentions the potential harvest of 3003 MBF of timber, there is no discussion of logging in the following discussion of Impacts of Nondesignation on Wilderness Values. Because this is a possibility in the future (even though not contemplated now), it should be addressed in the FEIS.

2-21 [Page 40 - fences: If there are no natural barriers in the unit, how will the partial alternative reduce management problems, and create a more manageable unit?

2-22 [Page 45, Environmental Consequences : Given the possibility of timber harvest on 800 acres, pipeline construction, possible oil and gas development, and other activities, how do you justify the statement that projected future management under nonwilderness management would have no measurable impacts to visual, wildlife, soil and water resources and threatened, sensitive or endangered species? Again, where is the information on rare plants, a listing of sensitive wildlife species, a listing of old-growth dependent wildlife, and other pertinent information?

2-23 [Page 46 - Recreation: again, given the potential for the development described above, we need to see justification for the "No impact" determination, especially as it relates to solitude and primitive and unconfined recreation (for the No Wilderness alternative).

Page 47, last paragraph : the phrase "either alternative" in line 1 should be corrected to read "either non-wilderness alternative . . ."

Thank you for this opportunity to comment. We request that our comments be included in the Final EIS. Again, we believe that the FEIS is required to examine a wider range of alternatives; we urge you to recommend, at a minimum, at least all of Burnt Creek and the northern two-thirds of Appendicitis Hill (as per the map submitted by Scott Ploger). If you have any questions or need more information, please let us know.

Sincerely,
THE COMMITTEE FOR IDAHO'S
HIGH DESERT

3-1: See Response 2-1.

3-2: This has been deleted from the FEIS.

21 September 1973

Mr. Kenneth G. Walker
Salmon District Manager
Bureau of Land Management
P.O. Box 430
Salmon, ID 83467

RE: Big Lost/Pahsimeroi Wilderness Environmental Impact Statement Draft

Dear Mr. Walker:

I greatly appreciate this opportunity for public comment on the Big Lost/Pahsimeroi Wilderness Draft Environmental Impact Statement analyzing the impacts of designating or not designating all, portions, or none of three Wilderness Study Areas as wilderness. The proposed action recommends a nonsuitable designation for the Appendicitis Hill WSA (31-14, comprising 21,900 acres) and the White Knobs Mountain WSA (31-17, 9,950 acres), and suggests that 8,300 acres of the 16,680 acre Burnt Creek WSA (45-12) be designated as suitable for wilderness designation. Thus, the BLM preferred Alternative (Alternative 4, Partial Wilderness) is to recommend only 14.6% of the acreage under consideration for wilderness status, which comprises 49.8% of the Burnt Creek WSA with none of the other two WSAs receiving wilderness qualification.

Of the Alternatives considered, the true public interest is best represented in Alternative 1, the "All Wilderness" Alternative. It is interesting to this reader that so few alternatives were designed, particularly for the Appendicitis Hill and White Knobs Mountain WSAs. It does not appear that a legally adequate full range of alternatives was designed or evaluated, as is mandated by NEPA and related guidelines. The choices presented in the DRAFT EIS for two of the WSAs do not include any kind of partial designation scheme, thus your document does not comply with NEPA in this regard. Lack of compliance with NEPA will place the BLM in the position of the Forest Service in the RARE II situation (see California v. Block, 690 Fed 2d 753, 1982, attached).

I would like to offer comment on the significant issues developed in the study process, as cited in the Summary (p. iv), as well as the listed "major reasons" leading to the exclusion of two WSAs from further wilderness qualification, and the "major reasons" for recommending only 8,300 acres of the Burnt Creek WSA as qualifying for wilderness recognition.

1) The amount of designated wilderness lands appropriate within the State of Idaho.

3-3: See Response 2-5.

3-4: Livestock grazing would not be affected by wilderness designation or nondesignation; its discussion is presented only to outline it as an allowable nonconforming use in BLM wilderness.

While the Wilderness Act's mineral exploration cut-off date is current law, we anticipate Congress will discuss in future wilderness legislation whether this cut-off is appropriate for BLM areas.

It is this reviewer's opinion that this issue is a red herring as regards wilderness designation recommendations. The amount or location of previously designated wilderness in the NWPS has no bearing whatsoever upon the qualifications of these sites. This kind of concern arises from an ignorance of the limits of use restraints wilderness designation would impose, and from a lack of understanding of the significance and values of wilderness to the larger public, the public trust responsibilities inherent in the FLPMA stewardship mandates of the BLM, and the limitedness of wilderness quality habitat in public domain lands. When one considers the vast expanse of public domain that has been historically transferred to state and private ownership, and the public domain as it exists today, the acreage of designated and surviving non-designated wilderness quality habitat is miniscule. This "issue" does not comprise valid grounds upon which BLM can found a "nonsuitable" designation, since wilderness is one of the highest of the seven "uses" delineated in the FLPMA. Organic Act stewardship (public trust) responsibility and multiple use mandates, in fact, could be construed to legally require All Wilderness as the Preferred Alternative - because of the limitedness of the resource, its fragility and the inability to mitigate heavily overgrazed public domain back to wilderness quality habitat at other sites, and because of the high standing wilderness has in comparison with secondary, consumptive and commodity based uses, such as grazing.

- 2) New wilderness designations are perceived as "locking up" public land areas.

This viewpoint is most often expressed by resource users in the commodity, consumptive, and commercial use categories. This misconception has no relevance to public interest based evaluations of potential wilderness.

- 3) The State of Idaho is concerned about access to and continued revenue production from State lands surrounded by Federal wilderness areas.

3-3

The BLM should explore land exchange possibilities with the State, or even outright purchase of conflicting inholdings if a cooperative arrangement cannot be reached. This issue should not deter BLM from recognizing wilderness qualities in its public trust lands.

- 4) The effects that a wilderness designation would have on existing uses, particularly livestock grazing and energy and mineral exploration and development.

3-4

Wilderness designation has no affect upon grazing levels unless they are so high that they impact the "naturalness" of the area. If they are abusively high, then they should be lowered in any event, since they would detract from multiple use protection of wilderness character and deny sustained yield. Mineral explorers have had ample time, i.e., from 1776 to 1984, to examine public domain lands. Mineral interests have known since the Wilderness Act was passed in 1964 that a deadline for exploration was approaching, and it is unreasonable to deny wilderness designation because special mining interests feel they have had inadequate opportunity to seek mineable assets in public domain land. Both of these issues are red herrings and should have nothing to do with the BLM's decision regarding wilderness suitability of these areas.

3-5: The quality of a WSA's natural characteristics must be evaluated as a part of a wilderness suitability determination. While the overall impact of vehicle ways and livestock watering sites is a subjective evaluation which will vary between individuals, they are in fact real on-the-ground modifications of the natural environment. The BLM has made a sincere effort to realistically evaluate the affect of human activity on the wilderness potential of this WSA. The example given in the comment is inappropriate because livestock grazing is a Congressionally allowed use in wilderness which would not be terminated and the EIS has not identified any areas being over-grazed.

3-6: See Response 1-8.

3-7: See Response 1-9.

- Quality of natural characteristics is low due to numerous improved vehicle ways and livestock watering sites.

3-5 Ecological condition and the presence of livestock watering sites should be a secondary consideration in present day wilderness designation evaluations. A century ago we might have had the luxury of picking and choosing among habitats of differing condition (had the Wilderness Act existed) so that only the best or the prime examples of habitat types were preserved. Today we are lucky to have a handful of potential examples surviving in varying degrees of "ecological condition." One of the remarkable aspects of the land and its biology, is its resilience once disturbing factors are removed. For example, if grazing is terminated in over-grazed areas, recovery usually occurs. There are some aspects which cannot be changed, such as the presence of introduced, rather than native, grasses or the loss of species diversity. Nonetheless, these sites are still possessing of wilderness character and unless they are designated, this quality will be eliminated or heavily diminished. These sites deserve designation regardless of historic evidence of grazing use. In two of the WSAs, the problem of terminating the "ways" could be solved by fencing the entire WSA and mitigating existing ways by obliterating them.

3-6 -Neither of the WSAs is required in the wilderness system to attain ecosystem diversity. The sagebrush steppe ecosystem (M3110-49) is represented in the Red Rocks Lake National Wildlife Refuge Wilderness Area.

The Bailey-Kuchler habitat classification system is notoriously macroscopic, and nowhere is it mentioned in the Wilderness Act. For example, aside from the macro-vegetation type recognized by your habitat classification system, a remarkable terrestrial lichen flora exists in the area of these WSAs. Included are species such as Agrestia hispida - otherwise unknown from the state. I would like to see some of this habitat preserved, rather than use "sagebrush steppe" representation in another removed setting as a reason for non-preservation. I would be very interested in seeing the BLM conduct lichen sampling using both transects and quadrats in the range of micro-habitats at these sites and compare the results with similar sampling at the Red Rocks Lake National Wildlife Refuge Wilderness Area. My guess is that there would be significant differences in species composition, dominants in communities, and species diversity. This issue is not a substantive reason justifying a non-suitability recommendation, and has nothing to do with the quality of the sites.

3-7 -Wilderness designation of both WSAs would increase primitive recreation and solitude acreage available to residents of Boise, Idaho by only 1%.

Again, the language with which you describe your evidence indicates your lack of objectivity and the clear intent to not designate these sites. In terms of the Bailey-Kuchler habitat designations, how much of the available sagebrush steppe wilderness habitat would this represent? Rather than use public appreciation in a negative manner, why not say that this would increase opportunities for a population base of over 100,000 individuals to enjoy wilderness quality sagebrush steppe habitat recreation in three areas totalling 56,830 acres.

- 3-8: See Response 1-10.
- 3-9: The BLM is not attempting to abrogate its management responsibilities. However, extensive fencing and enforcement implies a management problem.
- 3-10: The statement referred to has been removed from the FEIS as suggested. One must remember, however, that under the No Wilderness Alternative, exploration for mineral resources could occur and would indeed provide the industry the greatest opportunity to conduct such activities.

3-8

-The WSAs would not help balance geographic distribution of wilderness. Instead they would tend to concentrate it in central Idaho.

This is a ridiculous rationalization for non-designation. What should these areas do, move? Geographic adjacency to other sites of similar quality should only enhance an area's integrity. This kind of pointless whittling away at our wilderness core should be eliminated in the Final E.I.S. BLM does not suggest exploring only part of a rich mineral deposit because some has already been mined, nor should it imply this kind of logic regarding wilderness.

3-9

-The WSAs would be potentially difficult to manage as wilderness due to ease of vehicle access and lack of natural features for blocking vehicle access.

Vehicle access could be eliminated by fencing the WSAs and enforcing vehicle exclusion. It is true that it would be much easier to exclude vehicles from "cliff and lava flow" sites, but these sites don't happen to be cliffs, mountains, or impassible natural situations. That should in no way reflect upon the BLM's responsibility to maintain the wilderness qualities they possess or their qualification for wilderness designation.

3-10

-The no wilderness alternative provides the energy and minerals industry the greatest opportunity to conduct exploration activities.

This obvious statement should be removed from the Final E.I.S. The energy and minerals industry has had from 1776 to January 1, 1984 to explore these sites. When the Wilderness Act was passed in 1964 the energy and mineral industry was very well appraised that it had twenty additional years in which to explore potential wilderness areas for their commercial products. Indeed, it was because of this industry that such a clause was inserted in the Act. As the deadline approaches, there has been a flurry of activity and filing, so that there is no justification whatsoever for an extension of this timeline enacted long ago. It is extremely dangerous for the BLM to bow to this special interest pressure and imply that a wilderness designation decision would be at all influenced by the approaching cutoff date for free filing in wilderness quality undesignated habitats. The BLM would lose superior court review of such a decision.

-The No Wilderness alternative permits mechanical manipulation of vegetation to improve mule deer habitat in WSA 31-14 Appendicitis Hill.

The All Wilderness Alternative affords opportunity for greatest wilderness quality recreation and other benefits associated with BLM land use management toward broader public interest appreciation based upon non-commodity resource production and non-consumptive resource uses. Mule deer are a common, widely distributed species which can be hunted, observed, and studied over much of western North America. Wilderness quality habitat, however, is now extremely limited, and the kind of argument upon which the above statement is founded has little relevance to BLM's stewardship responsibilities and FLPMA mandates in making wilderness designation decisions. This is one of the lamest reasons I've ever encountered for justifying a non-suitability recommendation.

Both Burnt Creek and Short Creek roads should be closed, and the BLM should

3-11: See Response 2-1.

3-12: The WSAs not designated as wilderness would be managed according to the existing land use plans. The existing MFPs did not designate former WSAs 45-1 or 47-4, or any of the three WSAs in the EIS as ACECs. At any time these plans can be amended to reflect consideration of management of a WSA as an Area of Critical Environmental Concern.

make effort to ameliorate these marks of man. All of the Burnt Creek WSA should be designated wilderness. Roads and ways are greatly overblown by this Draft document, and it is clear that this analysis is striving for reasons to eliminate 85.6% of the potential acreage it evaluates.

The BLM should remember what the true public interest is, and keep in mind that uses such as grazing are ubiquitous on the public domain, while wilderness quality habitat has survived on only a small portion of the public domain. Were one confident that the BLM would manage these three sites to retain and enhance wilderness characteristics if the sites are not designated wilderness, compromise would be reasonable. However, your Draft document makes it clear that you fully intend to eliminate these characters after denial of wilderness suitability. As stewards of the public domain you should be taking the course of least consequences in your handling of fragile, limited resources. In reality we don't need more deer habitat enhancement in Idaho, and it is probably not legal for the BLM to discuss mineral and energy exploration after the January 1, 1984 as a reason to deny a WSA wilderness recommendation. This document seems to have evaded entirely the spirit and intent of the Wilderness Act,

3-11

This is an extremely cursory document; I urge you to read the attachments (though there is no need to reproduce them in the Final E.I.S. due to the volume), design additional "Partial Wilderness" Alternatives for the two WSAs without adequate alternative representation (to meet the legal requirements of NEPA), and to reconsider your preferred Alternative. If, because of manageability problems, you intend to maintain that these three areas are largely unmanageable without fencing - then you should pick the All Wilderness Alternative as your preference because this is the true public trust and public domain stewardship decision that must be reached if you are to live up to your role as keepers of the public's land. If a wilderness advocate were to argue that grazing, commodity production, and commercial uses were viewed the way private interests that make money off the public domain look at wilderness, a conservationist would be justified in saying that a vastly disproportionate acreage of the public domain is "locked up" in consumptive uses - which degrade and permanently exclude wilderness character. The FLPMA cites seven "multiple use" categories - and wilderness allows shared uses (such as grazing) and sustained yield more than many consumptive uses allow the survival of fragile resource elements. Wilderness has historically taken a back seat to all other uses, especially consumptive ones, and as we reach the "final" opportunity for preserving wilderness-quality habitat it should be BLM's decision to do so.

3-12

I nominate the former WSAs 45-1 Goldberg and 47-4 Borah Peak as Areas of Critical Environmental Concern on the basis of the qualities which originally made them eligible for wilderness Study Area status. Since all they lack is size, being less than 5,000 acres, these sites should be managed as ACECs to retain their wilderness character in lieu of designation of wilderness. As I mentioned earlier in this comment, one of the disturbing aspects of non-designation recommendation is that you offer no indication that management would make any attempt to preserve naturalness and wilderness characteristics in undesignated sites. I urge you to consider ACEC status for any excluded WSAs or portions of WSAs as an in lieu of management strategy for sites denied a positive designation recommendation. The "all or nothing" approach forwarded in the draft and reflected in the deficient range of alternatives for two WSAs could be moderated by consideration of the excluded sites as ACECs.

Our culture in America is famous for its Wilderness Areas and its National

Parks. These are all the heritage we have in terms of the oldest elements of our society's formation in the natural heritage setting - we have no medieval cathedrals or Roman ruins. It is a sign of cultural wisdom that we have chosen to preserve these key segments of our lands. Europeans and other cultures with no wildernesses admire us for this wisdom. There is no mitigation for the loss of any additional wilderness or habitat which could be restored to wilderness. The maximum potential value of these sites (i.e., mitigate through long-term management for wilderness character retention and toward maximum ecological condition) should be taken into account in your recommendation. What could they be at their best? That is what the public trust element of BLM stewardship mandates.

I am attaching California v. Block, 690 Fed 2d 753 (1982) so that you and your counsel will clearly understand why it is mandatory to re-design the Partial Wilderness Alternative to avoid the problem the U.S. Forest had resulting in the RARE II decision. I'm also attaching a number of other papers I would like included in the record. Since there has clearly been special interest pressure, I am including DeVoto's (1948) revealing analysis of pressure by grazing interests during the late 1940s. Nash (1978) discusses the values of wilderness to the public at large, and Coggins et al. (1982) analyzes the basic range law which demonstrates the bias special interests have had historically. I will forward the rest of the Environmental Law series as they are published.

Thank you for your consideration. Please include this letter and the attachments in the E.I.S. record.

Respectfully,



Peter A. Bowler
Star Route
Bliss, Idaho
83314

- 4-1: All three of the WSAs were found to possess the required wilderness attributes. The staff members evaluating suitability of the WSAs also developed the basic data and are thoroughly familiar with it. Refer to Response 2-9.
- 4-2: The purpose of this EIS is to examine the impacts of designating or not designating WSAs as wilderness. The allocation of forage for livestock and wildlife have been considered in the Ellis/Pahsimeroi and Big Lost MFPs, and in the Ellis/Pahsimeroi and Big Lost/Mackay Grazing EISs.
- 4-3: The impact of sand and gravel extraction in the appropriate WSAs has been described in the FEIS (see Chapter 4).

RANDALL E. MORRIS, D.D.S.

195 North Second West • Post Office Box 732 • Mountain Home, Idaho 83647
Telephone: (208) 587-4326



October 27, 1983

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

Dear Mr. Walker:

I strongly concur with The Committee For Idaho's High Desert comments on the Big Lost / Pahsimero Wilderness EIS Draft.

I would like to make three general observations:

- 4-1
- 1) The Craters of the Moon-Lost River Range area is one of the most isolated, least developed, and least populated regions in the lower forty-eight states. It is undeveloped even by Idaho standards where we are used to wide open spaces and unravaged mountains. That is why the highest concentration of nuclear reactors in the world is located less than an hours drive away. How in the name of rationality can you find the greater portion of the units identified in the Intensive Wilderness Inventory--the most wild of a wild region--as unsuitable for wilderness? Repeatedly the DEIS describes the wild nature of the units than finds unsuitability for wilderness. Did the staff member who determined the suitability read the data?
- 4-2
- 2) While this is not a large grazing area as far as AUM's are concerned, wildlife is given the short end of things as is the familiar pattern. While the wilderness EIS is not specifically a grazing document in the context of management plans, a wilderness alternative should offer at least one-half of the available AUM's to wildlife, as wildlife is one of the ten multiple uses under FLPMA and as no Congressional guidance is offered for distribution of grazing. One-half of the AUM's should be allocated to wildlife as stated.
- 4-3
- 3) While some mineralization is present, reference is made to sand and gravel and lime deposits, do we really wish to sacrifice de facto wilderness to roadfill and plaster? Our children and grandchildren will remember that the BLM sold a native birth right for a bowl of hydrated lime.

Thank you very much for allowing me to exercise my right to comment. The Committee For Idaho's High Desert has stated the case factually and eloquently. I can add no more.

Sincerely,

Randall E. Morris
Randall E. Morris

1308 N. 20th St.
Boise, Idaho 83702
October 26, 1983

Mr. Kenneth Walker
District Manager
Salmon District BLM
P.O. Box 430
Salmon, Idaho 83467

Dear Mr. Walker

This letter is in regards to Draft Big Lost/Pahsimeroi Grazing EIS. These areas constitute some of the most unique high desert lands in Idaho. I urge you to recommend that the entire Burnt Creek WSA and the northern two-thirds of Appendicitis Hill be recommended for Wilderness protection. Aside from the wilderness qualities inherrent to these areas, close proximity to Boise enhances their recreational value.

By preferring the above alternative you comply with the California vs. Block RARE II decision. Also, Wilderness protection for these areas further enhances the proposed Borah Peak Wilderness and protects another truly outstanding area.

Sincerely,



Dan Peterson

P.S. Please incorporate these comments in the final EIS.

6-1: See Response 2-1.

6-2: See Responses 1-9 and 1-10.

5716 Randolph Drive
Boise, Idaho 83705
October 25, 1985

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

Dear Mr. Walker:

I would like to offer the following comments on the draft Big Lost/
Pahsimeroi Grazing EIS. Please incorporate these comments in the final
EIS.

- 6-1 [1. I believe the range of alternatives which was considered is legally inadequate, based on the Forest Service RARE II lawsuit decision. I urge you to examine additional alternatives. Specifically, I urge you to examine and support an alternative which recommends wilderness protection for all of the Burnt Creek WSA and the northern two-thirds of Appendicitis Hill. The Burnt Creek WSA will expand and help maintain the integrity of the Forest Service's Borah Peak Wilderness (as well as protecting an area which is outstanding in its own right), as well as the heart of the scenic Appendicitis Hill WSA. If you do not select the All-Wilderness Alternative as your preferred alternative, I urge you to select this one.
- 6-2 [2. I cannot accept your rejection of wilderness protection for the majority of these WSAs on the basis of "concentrating Wilderness in Central Idaho" and "would only increase the wilderness acreage available to Boise residents by 1%." I don't consider Borah Peak and the lands to the south to truly be central Idaho, certainly not in the same way as the River of No Return Wilderness is. These areas should be evaluated on their own merits, and not an arbitrary standard. I think that the opportunity to increase wilderness recreation for Boise residents, even if only by 1%, is valuable and would enhance the quality of life to we residents of the metro Boise area.

Thank you for this opportunity to comment.

Sincerely,

Carol Kriz
Carol Kriz

7-1: See Response 2-1.

819 South Roosevelt
Boise, ID 83705
25 October 1983

Mr. Kenneth Walker,
District Manager
Salmon District BLM
P.O. Box 430
Salmon, ID 83467

Dear Mr. Walker,

I am writing with regard to the Draft Big Lost/Pahsimeroi Wilderness EIS. I strongly urge you to reconsider the decision to classify only part of the Burnt Creek WSA as wilderness, and ask you to recommend for wilderness protection the entire Burnt Creek WSA as well as the northern two-thirds of Appendicitis Hill. Both these areas are outstanding examples of the high desert, offering outstanding recreation and solitude. They are also easily accessible from Boise, which enhances their recreation value.

7-1 [Based on the California vs. Block RARE II court decision, it is my feeling that you need to examine at least one additional alternative in the final EIS to comply with this ruling. I hope you will closely examine the alternative outlined above, and select it as your preferred alternative. This will enhance the proposed Borah Peak Wilderness, as well as protecting another area outstanding in its own right.

Thank you for this opportunity to comment. Please include these comments in the final EIS.

Sincerely,



Dale Aspelund

- 8-1: The FEIS analyzes in detail the impacts to wilderness values of various development activities; the FEIS also analyzes the impacts to other resources from designating the WSAs as wilderness.
- 8-2: Timber harvest (commercial thinning) is anticipated only in the Appendicitis Hill WSA; impacts of this activity on wilderness values are discussed on page 26. Page 32 discusses the positive impacts on wilderness values if there was no timber harvest in the WSA.
- 8-3: There does not appear to be any significant benefits to wildlife through wilderness management that cannot be realized through the existing land use plans.
- 8-4: "Planning issues" were deleted from the FEIS.

Nov. 5, 1983

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

Big Lost / Pahsimeroi
Wilderness Draft EIS

Dear Mr. Walker;

8-1 [Please consider the following comments on the Big Lost/Pahsimeroi Wilderness Draft EIS, and include this letter in the Final EIS, even though it is a few days late. I find the significant issues identified, and the apparent decision criteria, badly biased against wilderness.

The significant environmental issues identified are listed on pages 5 and 6, and they are almost all in regard to possible negative effects on existing uses which a wilderness designation would have.

I fail to see why range management is an issue, as wilderness designation permits continued grazing, and even the maintenance of existing improvements. Nor, why more sagebrush destruction programs would be needed there to maintain current grazing levels if they are not too high.

8-2 [Wilderness designation would prevent timber harvest, a use I hope you are not seriously considering in these 3 WSA's. No mention is made of the benefit to the preservation of diversity, naturalness, and habitat if the timber is not harvested; that is, a benefit of wilderness designation.

For the hard-rock minerals, wilderness designation has little effect upon existing claims. For the leasables, the oil and gas speculators have already "locked up" most of the public land, both BLM and F.S., in Eastern Idaho. Wilderness designation would be a real benefit in keeping exploration out of a few remaining wild areas.

Under recreation, one item listed is "Restrictions on vehicle travel". This sounds rather negative, but the exclusion of ORV's from a few roadless areas in Eastern Idaho would be very positive, not only for the wildlife, but also for the traditional foot and horseback users.

8-3 [Under wildlife, the only item listed relates to ability to thin overgrown mt. mahogany in the Appendicitis Hill WSA. This is a fairly trivial issue when compared with the preservation of natural ecosystems and habitat in the 3 WSA's, or the lack of it. But this item is not mentioned.

8-4 [The planning issues identified as major are also rather strangely stated. The first and second relate to the strong views on wilderness, both pro and con. That is certainly a good and accurate point. But to imply that proponents of, as you put it, "full resource utilization" (i.e., greed), have a currently valid land ethic is a cop out. This view is far from true multiple use. Wilderness on the other hand is multiple use. It prevents, on a small fraction of the public lands, those few uses which typically degrade or preclude the other uses. I would like to see BLM do a little more on public education on the matter.

The other planning issue listed says that the State will insist on exchange or purchase of State sections surrounded by wilderness. This would seem to be no great issue, as only 2 State sections are in all 3 WSA's, and the one in Burnt Creek WSA can apparently be excluded by a reasonable boundary change.

8-5: See Responses 1-8, 1-9, and 1-10.

In the Summary on pages iv and v are given major reasons why Appendicitis Hill WSA and White Knobs WSA are recommended for non-wilderness. Neither singly nor in the aggregate are they good enough reasons for a non-wilderness recommendation. In fact, some of them are trivial.

One reason is that neither of these 2 WSA's "is required in the wilderness system to attain ecosystem diversity", and that this ecosystem (M3110-L9, sagebrush steppe) is represented at Red Rocks Lake Wilderness. But the attempt to encompass ecosystem diversity should be used as a floor, not a ceiling. If possible, we should have at least one of each type in the wilderness system, not at most one. Red Rocks Refuge goes from flat terrain, up to steep mountains abruptly. Any sagebrush steppe would have to be in a narrow band on northern slopes at the foot of the Centennials. If the ecosystem classification is that coarse, as to include both Red Rocks Lakes and these 3 WSA's, then it's too coarse to be of much use, especially when used perversely as an upper limiting factor.

Another reason given is that designation of the 2 WSA's would increase primitive recreation for Boise residents by only 1%. So what? What about eastern Idahoans?

8-5 [It is stated that designation would not help balance geographic distribution of wilderness, but would instead tend to concentrate it in central Idaho. Again, the concept of geographic distribution of wilderness should be used to help determine a lower limit on wilderness areas, not an upper limit. The idea of "balancing" distribution is so absurd when used this way, that it would lead to a "lowest common denominator" approach. That is, there are obviously a number of other places in the U.S. where the distances between remaining or designated wilderness is greater than in the Northern Rockies, so why not use those distances in determining what to designate as wilderness in the Northern Rockies? It's just another device to discriminate against wilderness. The remaining wilderness is not at all uniformly distributed, but it's important to save as much of it as we can. If you're going to worry about distribution, remember that in eastern Idaho, in spite of all the great remaining unprotected de facto wilderness, there is no designated wilderness except Craters of the Moon. (I consider these 3 WSA's in eastern Idaho.)

No-wilderness designation would provide for greater opportunity for oil exploration, but just how much of the public lands do we have to provide for this? The attitude in BIM appears to be that wilderness is not important when compared with the opportunity to drill everywhere for oil and gas. I object to this attitude.

In summary, I see no good reasons for not recommending wilderness for the bulk of all 3 WSA's. I would support the proposal made to you by Committee for Idaho's High Desert, with wilderness recommended for all of White Knobs WSA, and most of the other 2 WSA's.

Sincerely,

Jerry Jayne
 Jerry Gayne
 1568 Lola St.
 Idaho Falls, Id.
 83402

cc: O'dell Frandsen, I.F. Dist. BIM

P. O. Box 198
Marsing, Idaho 83639
Oct. 9, 1983

RECEIVED
DISTRICT OFFICE
SALMON, IDAHO

OCT 12 10 10 AM '83
District Manager
Bureau of Land Management
P. O. Box 430
Salmon, Idaho 83467

Dear District Manager:

I am writing in response to the Big Lost/Pahsimero Wilderness Study that the Bureau of Land Management is presently conducting. As I understand it, 8,300 acres of BLM land in the Burnt Creek area designated as WSA 45-12 has been recommended to be set aside as wilderness. I wish to go on record as supporting Alternative N - No wilderness for this area.

Although I am not against all wilderness recommendations, I would

not like to see any area in or near the Lost River Range designated as wilderness (I am also opposed to U.S. Forest Service Rare II Area 4-210 Borah Peak becoming wilderness). As a child I spent many years camping, fishing, and rock collecting with my parents in the Mt. Borah area. Some of my happiest moments as a child were spent while camping in that region. However, if this area had been designated wilderness when I was a child I would not have experienced those moments. Because of the physical stamina needed to hike into and camp within a wilderness area this requirement virtually prevents small children and most elderly adults from entering wilderness land and enjoying its solitude.

Today, I have two small daughters of my own and it is my desire that they enjoy the land within WSA 45-12 now and not when they become adults and are physically able to endure the hardships that backpacking requires. If you close most or all of the existing roads in this area, however, it will be years, if ever, before my children will be able to experience on that land the beauty and serenity that outdoor camping provided me when I was a child. I would not like to see this happen. Therefore, it is my desire that the area designated as WSA 45-12 and all other areas under the Big Lost/Pahsimero Wilderness Study be recommended as non wilderness.

Sincerely,
Howard L. Emery

10-1: See Response 1-9.

The SHOSHONE-BANNOCK TRIBES

FORT HALL INDIAN RESERVATION
PHONE (208) 238-3808
(208) 785-2080



TRIBAL FISH & GAME
P. O. BOX 306
FORT HALL, IDAHO 83203

October 27, 1983

Mr. Kenneth G. Walker
Salmon District Manager
U. S. Department of the Interior
P.O. Box 430
Salmon, Idaho 83467

Dear Mr. Walker:

The Shoshone-Bannock Tribes Environmental Committee has reviewed the Big Lost/Pahsimeroi Wilderness Draft Environmental Impact Statement and requested that I submit the following comments.

10-1 [On page iv, a listing of a summary of major reasons why two WSA's were recommended as nonsuitable for wilderness is provided. The third reason listed states "Wilderness designation of both WSA's would increase primitive recreation and solitude acreage available to residents of Boise, Idaho by only 1%." This is a very misleading statement which suggests that only the residents of Boise need to be considered in Eastern and Central Idaho Land Management decisions and not the residents of Eastern and Central Idaho. Regarding acreage there are members of the Shoshone-Bannock Tribe who also require solitude acreage for cultural and religious reasons.

After a review of all alternatives and the proposed action, the Shoshone-Bannock Tribes request that the bureau reconsider its preferred alternative and instead adopt the All Wilderness Alternative.

If I can be of further assistance in clarifying the Tribes position on this or any other issues, please don't hesitate to call me at (208) 238-3808.

Sincerely,

Dan M. Christopherson

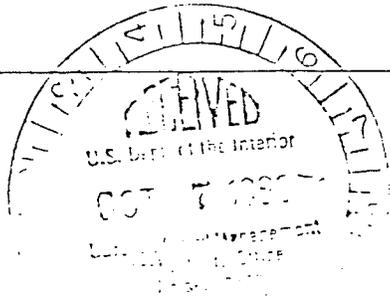
Dan M. Christopherson
Tribal Fish and Wildlife Biologist

DMC/vsl

11-1: The 8,300 acres of the Burnt Creek WSA recommended for wilderness under the Partial Wilderness Alternative could indeed stand on its own as wilderness. At the same time, it would be a logical extension of the Borah Peak RARE II area.

CONOCO

E. Fred Birdsall
Public Lands Coordinator



Conoco Inc.
555 17th Street
Denver, CO 80202
(303) 575-6123

October 4, 1983

Mr. George Weiskircher
Bureau of Land Management
3380 Americana Terrace
Boise, Idaho 83706

Dear Mr. Weiskircher:

Thank you for the opportunity to review the opportunity to review the Big Lost/Pahsimeroi Draft EIS. I do not believe this DEIS makes a persuasive statement for recommendation of any of the subject WSAs (31-14, 31-17, or 45-12) for wilderness. Certainly you make excellent validation for recommendation of non-wilderness for 31-14 (Appendicitis Hill) and 31-17 (White Knob Mountains), and without further discourse we approve of non-designation for those two units.

Burnt Creek (WSA 45-12) is partially recommended for wilderness-8,300 acres out of 24,980. While the 8,300 acres seems a modest amount this is, as you state, geologically interesting from an oil and gas point of view. And, as you indicate, heavily leased. The volcanic cover masks more exacting subsurface analysis. The main reason for recommendation of the 8,300 acres seems to be the possibility that nearby Borah Peak RARE II has been recommended for wilderness. This suggests that the 8,300 acres would not necessarily stand on their own, which is as we understand it a requirement.

11-1

Evidently the main impact of no-wilderness for Burnt Creek would be, per your DEIS, that from mining or dilling. If mining or drilling were to take place, that means this area has sufficiently attractive geologic potential to merit exploration investments in which case this should be the preferred land use. Yet if no mining or drilling takes place, then the absence of an impact does not require wilderness designation for protection.

The best of all worlds seems to be no-wilderness recommendation for Burnt Creek as well as Appendicitis Hill and White Knob Mountains.

Yours very truly,
E. Fred Birdsall

E. Fred Birdsall

jil
cc:
Alice Frell

RONAN, INC.
550 North 31st Street, Suite 500
P.O. Box 1354
Billings, Montana 59103
406 / 245-6248

October 21, 1983

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

Re: Wilderness Environmental
Impact Statement Draft
WSA 31-14 Appendicitis Hill
WSA 31-17 White Knob Mountain

Gentlemen:

Ronan Inc., an oil and gas company located in Billings, Montana, concurs with the Bureau of Land Management's Salmon District Office draft document recommending the captioned Wilderness Study Areas (WSA's) as nonsuitable for inclusion in the National Wilderness Preservation System.

Please refer to our original letter to the BLM, dated March 9, 1982, which stated that we had completed an intensive preliminary evaluation for oil and gas potential in parts of Custer and Butte Counties. Due to the positive nature of our initial findings for possible accumulation of hydrocarbons, we recommended that the Wilderness Study Areas (WSA's) located in and adjacent to these captioned areas be designated as non-wilderness.

Again, we concur with the BLM's draft recommendation for these captioned WSA's as nonsuitable for wilderness.

Sincerely yours,

RONAN, INC.



Fred D. Brinkman
Vice President - Land

FDB/jl



United States Department of the Interior

GEOLOGICAL SURVEY
RESTON, VA. 22092

In Reply Refer To:
EGS-Mail Stop 423

OCT 5 1983

Memorandum

To: District Manager, Bureau of Land Management
Salmon, Idaho

From: Assistant Director for Engineering Geology

Subject: Review of draft environmental statement for Big Lost/Pahsimeroi
Wilderness, Salmon and Idaho Falls Districts, Idaho

We have reviewed the draft statement as requested in your notice.

We have given only the most cursory review to the minerals data included in this report because the U.S. Geological Survey will prepare a comprehensive, detailed, joint report with the Bureau of Mines on the mineral resource potential of those areas recommended as suitable for wilderness, in accordance with Section 603 of FLPMA.

J. R. Rollo
James F. Devine

14-1

The Final EIS Proposed Action has changed the 8,300 acres suitable recommendation (Draft EIS) to nonsuitable. It was felt that the area needed extra size and diversity from the Forest Service lands to make a viable wilderness area. Even if Burnt Creek is not designated as wilderness by Congress, there is no projection of development in the 8,300 acre area. There will be no impact on wildlife species based on the detailed projection of activities for Burnt Creek as described in Chapter 2 of the EIS. Should the Forest Service recommend the contiguous Borah Peak area for wilderness, the recommendation could be altered.



IDAHO DEPARTMENT OF FISH AND GAME
600 South Walnut • Box 25
Boise • Idaho • 83707

October 5, 1983

Mr. Kenneth G. Walker
District Manager
Bureau of Land Management
P.O. Box 430
Salmon, ID 83467

Re: Big Lost/Pahsimeroi Draft
Wilderness Impact Statement

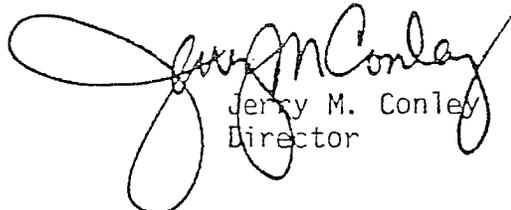
Dear Mr. Walker:

Department of Fish and Game personnel have reviewed the above-referenced document. We concur with the proposed action.

The 8,300 acre portion of WSA 45-12, Burnt Creek, has high wildlife value, particularly for Rocky Mountain bighorn sheep, elk, mule deer and antelope. Wilderness designation of this area, because it is contiguous with the Rare II Area 4-210 Borah Peak, would provide protection from future development activities and maintain a high quality hunting recreation experience.

Thank you for the opportunity to comment on this proposal.

Sincerely,



Jerry M. Conley
Director

cc: Program Coordination
Bureau of Wildlife
U. S. Fish & Wildlife Service

U.S. ENVIRONMENTAL PROTECTION AGENCY

REGION X

1200 SIXTH AVENUE
SEATTLE, WASHINGTON 98101



REPLY TO
ATTN OF: M/S 443

OCT 25 1983

Kenneth G. Walker
Salmon District Manager
Bureau of Land Management
PO Box 430
Salmon, ID 83467

Re: Draft EIS -- Big Lost/Pahsimeroi Wilderness

Dear Mr. Walker:

We have reviewed the Big Lost/Pahsimeroi Wilderness Draft EIS, and have no comments to offer at this time. We look forward to your sending us the Final EIS.

EPA has rated this Draft EIS LO-1 [LO -- Lack of Objection; 1-- Adequate Information]. We appreciate the opportunity to review the report. Should you wish to discuss any aspect of EPA's review, please contact Richard Thiel, Environmental Evaluation Branch Chief, at 442-1728 [FTS 399-1728].

Sincerely,


Ernesta B. Barnes
Regional Administrator



Department of Energy
Bonneville Power Administration
P.O. Box 3621
Portland, Oregon 97208

in reply refer to SJ

October 25, 1983

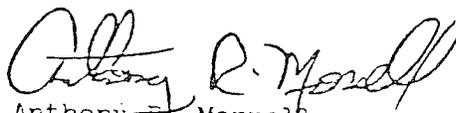
Mr. Kenneth G. Walker
District Manager
Bureau of Land Management
U.S. Department of the Interior
P.O. Box 430
Salmon, Idaho 83467

Dear Mr. Walker:

We have reviewed the draft environmental impact statement on the Big Lost/
Pahsimeroi Wilderness, and have no comment.

Thank you for the opportunity to study the draft document.

Sincerely,


Anthony R. Morrell
Environmental Manager



U.S. Department
of Transportation
**Federal Aviation
Administration**

Northwest Mountain Region
Colorado Idaho Montana
Oregon Utah Washington
Wyoming

17900 Pacific Highway South
C-68966
Seattle Washington 98166

MAY 16 1995

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

Dear Mr. Walker:

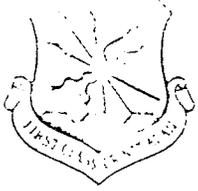
We have reviewed your draft Environmental Impact Statements on the Big Lost/Pahsimero Wilderness and the Challis Wilderness Plan Amendment and do not foresee any impact on aviation or its activities.

Thank you for the opportunity to review your proposed actions.

Sincerely,


Joseph W. Harrell
Policy & Planning Officer

18-1 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.



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

Bureau of Land Management
Big Lost/Pahsimuo/EIS

18 June 1985

District Manager

1. Of the three Wilderness Study Areas (WSA's), WSA 31-14 and 31-17 underlie a segment of our military training route (MTR) designated IR 302. This MTR has vertical limits of 100 foot above ground level (AGL) to approximately 6,500 feet AGL and aircraft are authorized ground speeds in excess of 540 knots. IR 302 is scheduled by the 124TRG/DO (124 Tactical Reconnaissance Group) Boise, ID. It is used by numerous Air Force, Navy, Marine, National Guard and Reserve units. Last year 1368 missions were flown in the vicinity of WSA 31-14 and 31-17. The usage of this MTR has continued to increase since it's establishment in 1979.
2. When MTR's are established, noise sensitive areas and low altitude civil aircraft activity are considered and avoided to the maximum possible extent. For these reasons many remote and sparsely populated areas administered by National Park Service, U.S. Fish and Wildlife Service, Bureau of Land Management and or U.S. Forest Service become optimum low altitude flight training areas. Department of Defense (DOD) policy as stated in a circular from the Federal Aviation Administration (AC No 91-36A) specifically advises, "military aircraft may at times overfly areas managed by the Department of the Interior at lower than the recommended 2,000 foot minimum, but in compliance with the minimum safe altitudes prescribed in FAR 91-79. Such deviations will occur only when essential to the mission being conducted." Use of this airspace down to the minimum published altitude and at maximum ground speeds is essential in accomplishment of our tactical flight training mission and is in compliance with FAR 91-79 and DOD policy.
3. Therefore, the 124 TRG strongly objects to the proposed establishment of wilderness areas 31-14, 31-17 and 45-12 because of the direct conflict of the tactical flight training mission and the wilderness characteristic of solitude. We cannot subject our current airspace to possible reduction because of noise complaints generated by military aircraft performing their mission over conservationists and recreationalists located in the proposed wilderness areas. Although WSA 45-12 currently is not within an established 124 TRG MTR, we periodically restructure the MTR's to enhance aircrew training. If IR 302 were moved 12 nautical miles (NM) east or IR 301/307 south 5 NM the aforementioned conflict would exist.


ROBERT R. CORBELL III, Col., IDANG
Group Commander

1 atch

18-1

- 19-1 BLM's wilderness management policy allows maintenance or stabilization on a case-by-case basis.
- 19-2 Wilderness management plans are developed following designation. Management of historic and prehistoric sites would be one element of any such plan.



September 16, 1985

Mr. Harold H. Ramsbacher
Deputy State Director for Renewable
Resources
Idaho State Office, BLM
3380 Americana Terrace
Boise, Idaho 83706

Dear Mr. Ramsbacher:

Below are our comments on the Wilderness Environmental Impact Statements for the Challis and Big Lost/Pahsimeroi Areas. Please excuse our delay in responding to your request for comments.

We agree the existing inventory is adequate to determine the effects of wilderness designation on archaeological and historical properties in the various Wilderness Study Areas under consideration. However, we do not believe the existing inventory is adequate to identify all the properties eligible for the National Register.

19-1

We are not sure whether wilderness designation will adversely affect the properties eligible for the National Register. This depends on the management of the wilderness. If the area is managed similarly to the Frank Church River of No Return Wilderness, then a "no effect" determination is appropriate. However, at one time the BLM wilderness management guidelines specified that historic properties (including prehistoric archaeological sites) in wilderness areas would be allowed to deteriorate without preventive maintenance or stabilization. If this is still true then wilderness designation would clearly be an adverse effect following the regulations (36 CFR800) of the Advisory Council on Historic Preservation.

19-2

A wilderness management plan needs to be developed that clearly recognizes the importance of historic and prehistoric properties and recognizes the need to preserve, stabilize, and research these sites. If such a plan existed then we certainly would agree wilderness designation would not affect archaeological and historic properties eligible for the National Register of Historic Places.

Sincerely,

Handwritten signature of Thomas J. Green in cursive script.

THOMAS J. GREEN
State Archaeologist
State Historic Preservation Office

TJG:rm