

AGENCY COMMENTS

Comments

Responses

A1

"Janet Samford"
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 y.org>
 04/04/2006 12:06
 PM
 <ID_CDA_RMP@blm.gov>
 "Brad Wagner "
 <brad_wagner@blm.gov>,
 <Scott_Pavey@blm.gov>, "William E.
 Schlosser, Ph.D."
 <schlosser@consulting-foresters.com
 >
 Subject
 CDA RMP Comments

Re: Resource Management Plan (RMP) Draft Volume III. Maps, 5. WUI and Fire Use Areas.

1 Benewah County is currently updating our WUI map to designate all land within the Rochat Creek watershed as WUI. Rochat Creek is the source of water for the St. Maries municipality. This was an oversight in our original map but we have contacted our contractor, Northwest Management and asked that it be changed. The BLM is the largest landowner in the watershed with approximately 2,889 acres. The map in the draft shows this area as Fire Use. We would like to see this designated as WUI in the final plan.

Janet Samford
 Benewah County Emergency Management
 County Point of Contact for
 Idaho State Fire Plan Working Group Benewah County
 701 College Ave
 St. Maries, ID 83861
 208-245-8032

A1-1: BLM has revised the WUI-Fire Use map (see Map 5) to include the Rochat Creek watershed.

A2

May 8, 2006
 Mr. Scott Pavey, RMP Project Manager
 Bureau of Land Management
 1808 N. Third Street
 Coeur d'Alene, ID 83814-3407

Dear Mr. Pavey:

The Coeur d'Alene Tribe's Natural Resource Department appreciates the ability to submit comments on the Bureau of Land Management's (BLM) Draft Resource Management Plan/Environmental Impact Statement (Draft RMP/EIS) beyond the published deadline of April 14, 2006. The Tribe has not had enough time to review the document in the type of detail that is needed and by all of the Tribe's affected programs and departments. The coordination with BLM on the development of the RMP/EIS and resulting RMP is important and the Tribe believes it would benefit both parties to discuss this during a meeting to be held as soon as possible.

Broad management plans that set overall policy are very important and the Tribe has the following initial comments on the BLM's Final RMP/EIS.

- 1) MAPS: Please place the current Coeur d'Alene Reservation boundaries on all of your maps in order for the Tribe to better locate the RMP's impacts on Reservation resources.
- 2) LAND RETENTION/ACQUISITION: The Coeur d'Alene Tribe would like to meet with the BLM to discuss Draft RMP/EIS retention/acquisition areas that are located on and near the Coeur d'Alene Reservation. The Tribe has concerns regarding the BLM's plans to acquire land on the Coeur d'Alene Reservation. Also, the Tribe would like to discuss management of the 180 acres owned by BLM on the Reservation.
- 3) Tribal IRMP: The Coeur d'Alene Tribe would like the BLM to list the Tribe's Integrated Resource Management Plan (IRMP) Draft Programmatic Environmental Impact Statement (DPEIS), and eventually, the resulting IRMP, in the policies and plans coordination section in the BLM's Final RMP/EIS; additionally, the Tribe would like BLM to include a discussion on how the BLM's RMP/EIS is consistent or inconsistent with the Tribe's Preferred Alternative B in the IRMP DPEIS. The Tribe would like BLM to make any adjustments to the EIS that are needed in order to make the RMP/EIS consistent with the Tribe's draft EIS. This can also be a topic of a follow-up meeting with the Tribe.
- 4) AIR QUALITY: The Tribe would like BLM to discuss coordination with the Tribe's Air Quality Program in its goals.

A2-1: In response to this comment, BLM prepared a set of maps with the Reservation boundaries for the Tribe.

A2-2: As requested by the Tribe, BLM has met with them to discuss this, and other concerns.

A2-3: As requested by the Tribe, BLM has met with them to discuss this, and other concerns. BLM has also reviewed the Preferred Alternative of the Tribe's Integrated Resource Management Plan, and found nothing in the Proposed RMP/Final EIS that was inconsistent. BLM will work closely with the Tribe to identify ways to make the plans more complementary.

A2-4: As specified under all alternatives, BLM would coordinate activities affecting air quality with the Montana/Idaho Airshed Group, of which the Tribe is a member. BLM has also added an objective and action to the Air Quality section (Objective AQ 1.4 and AQ 1.4.1) that would require BLM to coordinate directly with the affected Tribe, regarding prescribed fire and wildland fire use within reservation boundaries.

Comments

Responses

A2 (Cont.)

- 5 5) **RECREATION:** The Tribe has noted the emphasis that the BLM has placed on Recreation in the RMP/EIS. The Tribe requests that BLM consult with the Tribe's Lake Management Department to coordinate recreation efforts on and near the Coeur d'Alene Reservation (as well as coordination with the Tribe's Culture Program as illustrated in comments below).
- 6 6) **Coordination and Consultation:** The Tribe would like BLM to add a section in the RMP/EIS that discusses overall coordination and consultation with the Coeur d'Alene Tribe in terms of implementation of the RMP on an ongoing basis within the Tribe's aboriginal territory.

Coeur d'Alene Tribe Cultural Resources Management Program Comments on Coeur d'Alene BLM office Draft RMP/EIS released January 2006

VOLUME I

- 7 Throughout document: recommend removing minimizing qualifiers to the word "impact" or "impacts" such as "minor" and "slight" (e.g. "minor impacts"). This is a subjective judgment and particularly in the areas of cultural resources, tribal trust issues, and so on, the assessment of what is "minor" or "slight" may be significantly different for Tribal members and staff than for BLM staff.

Table 2-1 "Management Guidance for All Alternatives"
Cultural resource discussion in begins on pg. 2-76

- 8 Alternative B, C, and D now propose "develop a long-term monitoring schedule by 2009 that identifies a representative sample of sites or TCPs that will be examined on an annual basis"
Alternative A has "recommend site protection measures to protect at-risk sites"
-Does this mean A has more or less monitoring?
-Why not 100% monitoring of all sites/TCPs?
-Are sites and TCPs mutually exclusive categories?
If so, provide clear definitions. If not, rephrase to reflect this.

Chapter 3 Affected Environment
3.2.9 Cultural Resources begins on page 3-44

- 9 All Cultural Resources "would be allocated to one or more use categories under all the alternatives addressed in this plan."
-Isn't the obligation to maintain all Cultural Resources even if there is no "use"?

- 10 Pg 3-68 lists the following as "major settlements on the reservation" with a reference date of 2004: "Benewah, DeSmet, Plummer, Tensed, and Worley."
-What about St. Maries?
-Where is the "major settlement" of Benewah?

2

A2 (Cont.)

- 10 -Why was the information obtained from the Economic Development Center rather than the Tribe?
- 11 Pg 3-69 "Pacific Crown Timber Products is the largest private employer of tribal members in this domain"...
-Should this be "Crown Pacific..."?
-If so, has their bankruptcy changed this information?
- 12 Traditional Uses Pg 3-69
"Currently, Native American tribes do not depend on commodity resources from lands managed by the CdA FO for their economic livelihood, but they do use resources on BLM public lands for subsistence and cultural purposes."
-What is meant by "subsistence" in this case?
-Generally "subsistence" hunting, fishing, etc are part of a household economy.
- 13 Chapter 4—Environmental Consequences
pg 4-110)
** Acres and relative depth of ground-disturbing activities permitted and their potential for affecting known or unknown intact cultural resources or areas of importance to Native American or other traditional communities;"
-Recommend deleting word "intact". Cultural resources do not need to be completely intact to merit protection from further impacts.
- 14 pg 4-110 and 4-111
-This list of laws should add AIRFA and other relevant statutes.
-Why the word "any" before TCPs in the section "Impacts from Water Resources Management"?
-Same paragraph: recommend deleting word "slightly".
- 15 Pg 4-111
"Alternative B" paragraph.
This paragraph states "additional emphasis on measures to promote commodity and recreational species. These include species that have been fished or hunted traditionally and these actions would enhance opportunities to continue cultural use."
-These actions would also increase non-traditional use, competition for traditional species, and may increase recreational species (e.g. introduced fish like walleye) populations. Some of these species compete with and/or prey upon native species that are traditionally used.
- 16 Pg 4-117
1st paragraph (is under "cumulative impacts" section)
"The RMP recognizes that tribal knowledge contributes to the management of cultural resources and that traditional use areas or sacred sites can be TCPs that need to be treated as protected cultural resources."
-Some legal phrasing questions:

3

A2-5: A specific reference to coordination with the Tribe has been added to Action RC-D1.2.9.

A2-6: BLM is coordinating with the Tribe to determine the best means to accomplish this.

A2-7: These are subjective qualifiers that BLM used to distinguish what it determined to be lesser impacts from greater ones. BLM understands that Tribal members' and staff's opinions may differ from BLM's.

A2-8: Alternative A does not have more monitoring and in fact proposing the development of a monitoring schedule in the other alternatives will allow a more focused approach in the future. Development of a cultural resource monitoring schedule allows BLM to prioritize those sites or areas, including TCPs, that takes into account current or potential impacts as well as the significance of those resources. Thus, by developing a schedule more important sites will be monitored more frequently and the initial development of the schedule can also be coordinated with the Tribes and Idaho State Historic Preservation Office.

Because of workloads and funding limitations 100% of all sites can not be monitored. Establishing a schedule will focus the monitoring efforts to those sites or areas with the greatest need.

TCPs are considered cultural resources but not all cultural resources are TCPs. See the definition that BLM added to the glossary.

A2-9: Cultural resources are assigned to use categories. It is a mechanism to help guide future uses of the resource. The only category that may be of question is the Discharged from Management. This category is only for those sites that have been destroyed. Cultural resource Action CR-B1.3.1 recommends establishing a schedule to collect the necessary data to make informed use allocations. This also allows the BLM to coordinate these decisions with the affected Tribes and the Idaho State Historic Preservation Office.

A2-10: BLM has made these corrections and will coordinate with the Tribe to acquire accurate data in the future.

A2-11: This sentence has been deleted from the Proposed RMP/Final EIS.

A2-12: The term 'subsistence' has been deleted from the paragraph.

A2-13: This change has been made.

A2-14: The American Indian Religious Freedom Act (AIRFA) is referenced in the first sentence on page 4-111 at the end of the paragraph listing the primary statutes to which the Antiquities Act of 1906 was added. Also, "any" and "slightly" have been deleted.

A2-15: Before any introduction of a new species the BLM, Idaho Fish and Game, the affected Tribes, and any other interested parties would be consulted.

A2-16: "Are" would pertain to current management; "need to be" would pertain to future management.

Comments

Responses

A2 (Cont.)

- 16 -Should "or" be "and/or"?
-Is it meant that TCPs "need to be treated as protected cultural resources" or TCPs "are protected cultural resources"?
- 17 Section 4.5.3 Native American Trust and Interests (begins pg 4-184)
1st paragraph: -why only subsistence species? Not all culturally important species are subsistence related.
- 18 4.5.3.3 Cumulative Effects begins on pg 4-191
alternative A ... last paragraph pg 4-191 "...changes in the natural resource base brought about my insect and disease..."
-Change "my" to "by".
- 19 4.6 Unavoidable Adverse Impacts one paragraph pg 4-193
-These are written off with "Virtually all potential unavoidable adverse impacts are indirect, long-term, and difficult to quantify."
-This statement and the preceding generalized statements in the single paragraph discussion do not provide enough information to assess the unavoidable impacts of the proposed alternatives.
- 20 4.7 Irreversible and Irretrievable Commitment of Resources all on pg 4-194
pg 4-194 "Undiscovered cultural resources may be affected by the alternatives...Cultural resources are by their nature irreplaceable, so the alteration or elimination of any such resource, whether National Register-eligible or not, represents an irreversible and an irretrievable commitment."
-Yes indeed.
- 21 Pg 4-194 last paragraph: "The exact nature and extent of any irreversible and irretrievable commitment of resources cannot be defined due to uncertainties about location, scale, timing, and rate of implementation, as well as the relationship to other action and the effectiveness of mitigation measures."
-Again it seems that because it is difficult and imprecise, no information is given at all that allows the comparative evaluation of the alternatives for this issue.
- 22 Appendix F: Mineral Leasing Surface Use Stipulations
Cultural resources:
Stipulation: no surface occupancy allowed in areas of cultural or spiritual value to Native American Tribes.
Exception: "The authorized office may grant an exception if environmental analysis and Tribal consultation on a proposed action reveals that these values would not be impacted, or that impacts could be adequately mitigated."
Modification: "Through Tribal consultation, the boundaries of these areas may be changed."
Waiver: "This stipulation may be waved (sic) with written approval from the concerned Native American Tribal Council."

4

A2 (Cont.)

- 22 -Recommend: **There may be more than one concerned Native American Tribal Council. Written approval should be obtained from all concerned Native American Tribal Councils.
*correct spelling of "waved" to "waived"
- 23 Pg G-7
Relevance, point 1...notes that an area meets relevance criteria if it "'has a significant historic, cultural, or scenic value (including but not limited to rare or sensitive archeological resources and religious or cultural resources important to native Americans).'"
-Recommend correcting "native" to "Native"
- 24 Appendix J: Wild and Scenic Rivers Study
Pg J-1-3: note that there are Cultural and Historical criteria for "Outstandingly Remarkable Values" portion of the WSR designation
-Cultural discussion pertains to ONLY prehistoric sites. "The stream corridor contains prehistoric sites that are rare, have unusual characteristics, or possess exceptional human-interest values. Sites may have national or regional importance for interpreting prehistory, be rare, or represent an area where a culture or cultural period was first identified and described. Sites may have been used by two or more cultural groups or may have been used for rare or sacred purposes."
- 25 -Historical states "'The stream corridor contains sites or features associated with a significant event, an important person, or a cultural activity of the past that was rare or unusual in the area. Sites or features listed or eligible for inclusion in the National Register of Historic Places may be of particular significance.'"
-This discrepancy needs to be addressed.
- 26 Pg J-A-3 NOTE: "'A.2.6 Cultural
The river or area within the river corridor contains a site or sites where there is evidence of occupation or use by Native Americans. Sites must be rare or must have unusual characteristics or exceptional human interest values. Sites may have national or regional importance for interpreting prehistory; may be rare; may represent an area where culture or a cultural period was first identified and described; may have been used concurrently by two or more cultural groups; or may have been used by cultural groups for rare or sacred purposes.'"
-This is different than the "Cultural" criterion outlined in previous section where "prehistory was earlier in the statement making it imperative to the cultural designation.
- 27 -Refer back to J-1-3 section on "outstanding Remarkable Values" for "Cultural"
Question: "an area where culture...was first identified" Should this be "an area where a culture...was first identified"?

5

A2-17: The word "subsistence" has been deleted.

A2-18: Correction made.

A2-19: BLM feels that this paragraph is very specific.

A2-20: Thank you for your comment.

A2-21: The RMP provides general guidance for actions that may occur on BLM-administered lands. The plan itself, and the alternatives, are intentionally non-specific. Therefore, it is not possible to be more detailed than the description provided.

A2-22: The waiver statement has been changed to indicate that there may be multiple "concerned Tribal Councils."

A2-23: Correction made.

A2-24: Eligibility criteria listed in the Wild And Scenic Rivers Act specifically includes "cultural" and "historical". The criteria definitions used in the RMP Appendix J are paraphrased from BLM Manual 8351 – Wild and Scenic Rivers.

A2-25: Please see response A2-24.

A2-26: Please see response A2-24.

A2-27: This wording was paraphrased from the BLM Manual 8351 – Wild and Scenic Rivers.

Comments

Responses

A2 (Cont.)

VOLUME III--Maps

- 28 General comments:
The backcountry byway through Grandmother Mountain area will negatively impact cultural resources by sharing information about the area and providing increased access. This byway is in alternatives B, C, and D (only the "no action" alternative A does not have it and A has other drawbacks).
-Could this byway be removed from alternatives B, C, and D?
- 29 Alternatives B,C, and D have Rochat Divide and other areas designated as Special Recreation Management Areas and Developed Recreation Sites. Maps 20-23 will illuminate this. There are trails and other cultural sites in the vicinity of recreation sites. Suspect that the areas need to be surveyed for cultural resources. Less area developed for recreation means less traffic in cultural areas particularly the Rochat Divide/Pine Creek, Silver Valley, and Widow Mountain. Further north, Gamlin Lake near Lake Pend Oreille, is planned for development that could compromise cultural resources.
-If development does occur, suggest using planning, education, and all other means to protect cultural resources.
- 30 Map 44 "land and realty alternative D" demonstrates that more land area is open to consideration for acquisition under this alternative than the others. There is more potential for getting land into BLM (federal) ownership and less potential for having land go out of federal control. However, potential is not the actual outcome.
- 31 Maps 46-64 illustrate proposed "Areas of Critical Environmental Concern"
These could offer protection to cultural resources depending on how they are managed.
- 32 Summary
The Tribe believes that it is in everyone's best interests to coordinate planning as much as possible. There are a number of items that the Tribe would like to discuss with BLM regarding the RMP/EIS in order to work more collaboratively. The Tribe would like to meet with the Bureau of Land Management to further discuss the RMP/EIS. Please contact my office at (208) 686-8802 to schedule a meeting at the earliest convenience for both parties.

Sincerely,

Tiffany Allgood
Environmental Action Plan Coordinator

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A3



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10
1200 Sixth Avenue
Seattle, WA 98101

April 13, 2006

Reply to
Attn Of: ETPA-088

Ref: 05-073-BLM

Scott Pavey
Bureau of Land Management
Coeur d'Alene Field Office
1808 North Third Street
Coeur d'Alene, ID 83814-3407

Dear Mr. Pavey:

The U.S. Environmental Protection Agency (EPA) has reviewed the draft Environmental Impact Statement (EIS) for the Coeur d'Alene Resource Management Plan in accordance with our responsibilities under the National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act. Section 309, independent of NEPA, specifically directs EPA to review and comment in writing on the environmental impacts associated with all major federal actions. Under our policies and procedures, we evaluate the document's adequacy in meeting NEPA requirements.

The draft EIS analyzes one no action alternative and three action alternatives. The planning area is located in the Panhandle region of northern Idaho and encompasses 5,077,776 of private and public lands. Approximately 96,770 acres of that planning area are administered by the BLM. Alternative A (No Action) considers the continuation of the current management. Alternative B emphasizes active management for commodities, amenities and services. Alternative C includes management strategies to preserve and protect resources such as wildlife habitat, water quality, etc. Alternative D (Preferred Alternative) represents a variety of management activities intended to balance commodity and non-commodity resources usage.

- 1 We have rated the EIS, EC-2 (Environmental Concerns-Insufficient Information). We support the selection of the preferred alternative, since it strives to balance resource protection with active management of commodity resources. However, we have some questions regarding clarity of the document and concerns regarding resource areas. We recommend including additional discussion on air and water quality issues.

We appreciate the opportunity to review the draft EIS for this project. Our rating and a summary of our comments will be published in the Federal Register. Enclosed please find a copy of the rating system used in our review for your reference. Should you have any questions

A2-28: BLM has removed backcountry byways from all alternatives in the PRMP/FEIS.

A2-29: If a recreation site development is proposed a cultural resource inventory would be completed, consultation initiated with affected Tribal groups, and the appropriate environmental review document completed.

By actively managing recreation the BLM will be better able to proactively protect cultural resources.

A2-30: The boundaries on this map are simply an estimate of the lands BLM currently manages that meet the criteria

A2-31: Some proposed ACECs were identified for cultural values. Indirect effects of designation on cultural resources are discussed in Chapter 4, Section 4.2.11.2. for retention and acquisition. The criteria themselves would be used to determine whether to acquire new lands.

A2-32: BLM has coordinated with the Tribe as requested.

A3-1: Please see responses A3-3, A3-4, A3-5 and A3-6.

Comments

Responses

A3 (Cont.)

2

regarding our comments please contact Denise Clark by phone at (206) 553-8414 or by email at clark.denise@epa.gov, or me at (206) 553-1601.

Sincerely,

/S/

Christine B. Reichgott, Manager
NEPA Review Unit

Enclosures

cc: Idaho Operations Office

A3 (Cont.)

EPA Comments on the
Coeur d'Alene Resource Management Plan DEIS

2 Preferred Alternative
Although Alternative C would be the environmentally preferred alternative, EPA believes that Alternative D provides management that would protect sensitive resources while allowing more active management than Alternative C. We are very pleased that the RMP would incorporate the goals and objectives from the Interior Columbia River Basin Strategy. The use of riparian conservation area guidelines pursuant to the Coeur d'Alene Native Fish Strategy will contribute to improvement in water quality and aquatic habitat improvements as well as prevention of future impacts.

3 Livestock Grazing
The draft EIS proposes to either keep the grazing allotments at the same level under alternatives A and B or reduce them by 1,218 acres under Alternative C and D. Section 3.3.2, **Livestock Grazing**, in the Affected Environment Section lists the allotments managed by the BLM and their current status. However, the EIS fails to describe the condition of each allotment. We recommend including the a summary of environmental condition of each allotment, including quality of forage plants, streambank stability, and sediment inputs to streams that may exist on the allotment or that are affected by grazing. We also recommend that Section 4.2.3, **Water Resources**, describe which allotments would be closed to grazing, the environmental benefits that would result from closing the allotments as well as the economic impacts that would potentially result from closure.

4 Air Quality
We understand that prescribed and wild fire can potentially impact air quality. One tool that assists in the management of smoke emissions is a smoke plan. We are concerned with the release of particulate matter (PM) caused by prescribed fire but realize that reducing some fuel loads now may prevent low frequency, high intensity fires releasing more PM later. The draft EIS states that the BLM participates in the Montana-Idaho Airshed Group and coordinates its prescribed burning with the Idaho Department of Environmental Quality (IDEQ) and other federal agencies. To manage these activities, we support working with the state to develop a smoke management plan and recommend including information on the plan in the final EIS as well as demonstrate how the project will meet National Ambient Air Quality Standards.

5 Water Resources
Table 3-2 lists the Clean Water Act designated impaired waterbodies near BLM land. We recommend that the EIS discuss how the proposed alternatives will facilitate these streams meeting water quality standards. We understand that effective implementation of BMPs and the CNFISH goals and objectives would likely assist in the recovery of some of the listed streams. We recommend that the final EIS discuss the streams that are likely to be improved by implementation of the revised RMP. In addition, we recommend that the final EIS identify how the BLM will coordinate with the IDEQ to insure that activities on BLM land will contribute to meeting the goals of the Total Maximum Daily Loads that have been developed and those that are currently in development as well as not contribute to degradation of existing high quality water.

A3-2: Thank you for your comment.

A3-3: Each allotment is reviewed during the Standard and Guideline process where specific information is gathered, reviewed, and resolved. An RMP gives BLM overall direction; specific allotment detailed evaluation is not part of this process.

A3-4: In addition to the overall air quality program guidance and IDEQ coordination provided by the Idaho-Montana Airshed Group, BLM prepares a site-specific, project-level smoke management plan for each prescribed burn.

A3-5: Because of the generally low percentage of BLM-administered lands within many of the TMDL watersheds, in most cases the activities outlined in the RMP will help, but not necessarily achieve, the goals of the TMDL. On the project level, BLM will coordinate with IDEQ to design site-specific BMPs in TMDL watersheds. This currently involves jointly consulting with IDEQ and the Army Corps of Engineers on 404 permit applications within TMDL watersheds. The Corps issues a 404 permit and IDEQ issues a letter of consent. BLM will continue to comply and stay current with IDEQ or EPA regulations regarding TMDLs as the process evolves.

Comments

Responses

A3 (Cont.)

2

Source Water

The EIS did not discuss any source water areas in the project area and therefore, this raises concern regarding potential impacts to source water if there are any source water areas in the project. Public drinking water supplies and/or their source areas often exist on lands under federal management. Activities such as timber harvesting, grazing, and recreation, may adversely affect waters that serve as sources of drinking water for communities. The 1996 amendments to the Safe Drinking Water Act (SDWA) require federal agencies that manage lands that serve as drinking water sources to protect these source water areas. source water is untreated water from streams, rivers, lakes, springs, and aquifers that is used as a supply of drinking water. source water areas are the sources of drinking water delineated and mapped by the states for each federally-regulated public water system.

State agencies have been delegated responsibility to conduct source water assessments and provide a database of information about the watersheds and aquifers that supply public water systems. We recommend that the USFS/BLM contact the state agency (either DEQ or DHS) responsible for developing and maintaining this database to help identify source water protection areas within or downstream of the project area. Typical databases may contain GIS and Access information for the watersheds and aquifer recharge areas, the most sensitive zones within those areas, and the numbers and types of potential contaminant sources identified for each system.

6

EPA recognizes that providing high quality drinking water to protect human health is a high priority for land management agencies. Implementing protective actions and land use decisions can be very effective in providing clean source water to public intakes and wells. This will preserve the use of public funds that would otherwise be spent to upgrade treatment facilities to remove contaminants downstream. Therefore, EPA recommends that the draft EIS:

- Identify all federally-regulated source water protection areas and state-regulated source water protection areas, if the state agency maintains such a list, within or downstream of the project area;
- Identify all activities that could potentially affect source water areas;
- Identify all potential contaminants that may result from the proposed project;
- Identify all measures that would be taken to protect the source water protection areas in the draft EIS.

Also, if the project has the potential to affect a source water protection area, we recommend that the draft EIS address the enclosed document, "Steps to Take to Incorporate Source Water Protection into Your Plans and Projects."

We have also enclosed a draft document, EPA Region 10 Source Water Protection Best Management Practices for USFS, BLM. This document is a compendium of BMPs that were collected from a host of sources directed at protecting drinking water. This document is intended to provide a broad list from which to select appropriate BMPs that can be applied to a specific plan or project. The list is not comprehensive and additional BMPs may be appropriate to ensure adequate protection of source water areas.

A3-6: Source water suggestions have been incorporated into the Proposed RMP/Final EIS, particularly the coordination with IDEQ. BLM added the BMPs in the draft list from EPA to Appendix A.

BLM uses the source water database provided to us by IDEQ. BLM also continues to notify and coordinate with the public water system operator for proposed activities within a source water areas.

Specific potential contaminants and protective measures for a proposed activity will be identified during project level planning.

A4



STATE OF IDAHO
DEPARTMENT OF
ENVIRONMENTAL QUALITY

2110 Ironwood Parkway • Coeur d'Alene, Idaho 83814-2648 • (208) 769-1422

Dirk Kempthorne, Governor
Toni Hardesty, Director

April 20, 2006

RECEIVED

APR 21 2006

Scott Pavay
Bureau of Land Management
Coeur d'Alene Field Office
Attn: RMP
1808 N. Third Street
Coeur d'Alene, ID 83814

BUREAU OF LAND MANAGEMENT
COEUR D'ALENE ID 83814

RE: Comments on BLM Draft Resource Management Plan and EIS

Dear Mr. Pavay,

The Coeur d'Alene Regional Office of the DEQ has reviewed the water quality portion of this draft plan and has the following comments:

1

1. Table 3-2 lists impaired water bodies near BLM land. This information was obtained from our 1998 303(d) list. The table is missing some pollutants and has an incomplete list of impaired waters in some of the watersheds. However, we are happy to announce that our 2002 303(d) list has been approved by EPA and this is the list you should be referencing in the Final EIS. It is available on our website. Please include those waters that have total maximum daily loads (TMDLs) developed as well as those currently listed (sections 4a, 4b, 4c and 5). Also recognize that some TMDLs include much of the watershed above the listed segment.

2

2. Section 4.2.3.2 discusses impacts of soil resource management for each alternative and potential effects on water resources. The Alternative A discussion indicates that by implementation of best management practices (BMPs) associated with new activities such as road building and timber harvest, water quality would be improved. This is rarely the case with new activities, however, it can be true for existing disturbances. New activities often add significant pollutant loads even when BMPs are utilized. This concept is particularly important to understand when working in impaired watersheds in order to comply with the Idaho Water Quality Standards (Standards). It is also important to realize that everyone's activities, whether noted or not in the TMDL, contribute to further impairment or improvement of the watershed.

A4-1: Table 3-2 and subsequent analysis were revised according to this comment.

A4-2: Thank you for your comment. This and all comments submitted were considered when BLM prepared the FEIS.

Comments

Responses

A4 (Cont.)

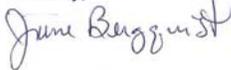
Scott Pavey
April 20, 2006
Page 2

2 Specifically, the Standards require that 303(d) listed impaired waters that have a high priority for development of a total maximum daily load must not have new or increased discharges of the causative pollutants (IDAPA 58.01.02.054.04.). Once the TMDL is developed and approved, the activity will be allowed only if consistent with that TMDL.

3 If you are planning a pollutant loading activity such as road building in a listed or TMDL watershed, as discussed above, you must reduce the load elsewhere in the watershed to so it remains constant or decreases. Examples of load reducing projects are road obliteration, cattle enclosure fencing, bank stabilization projects, reforestation along stream corridors, etc. which can significantly reduce sediment and temperature pollutants. Realizing a net reduction in loading with every activity along with special load reducing projects will gradually move the water body towards recovery of all beneficial uses.

For further information on the status of a stream or questions about the rules please don't hesitate to contact me.

Sincerely,



June Bergquist
Regional Water Quality Compliance Officer

cc: IFG-Mary Terra-Berns
EPA Boise-John Olson

A4-3: BLM is aware of special requirements within TMDL watersheds, and has designed BMPs for road building and other activities with these requirements in mind. BLM will continue to work with EPA to refine our BMPs for activities in TMDL watersheds.

A5



IDAHO DEPARTMENT OF FISH AND GAME
PANHANDLE REGION
2885 West Kathleen Avenue
Coeur d'Alene, Idaho 83815

Mr. Eric Thomson
Bureau of Land Management
Coeur d'Alene Field Office
1808 N. Third Street
Coeur d'Alene, ID 83814-3407

Dear Eric:

REFERENCE: DRAFT COEUR D'ALENE RESOURCE MANGEMENT
PLAN AND EIS

Thank you for the opportunity to comment on the Draft Coeur d'Alene Resource Management Plan and Environmental Impact Statement.

We realize the importance of this document and appreciate the effort that your staff has invested in its preparation and development. The document is well organized and straightforward, which facilitated our review. Additionally, it is obvious that an incredible amount of energy went into the development of the associated reference maps. Although we were unable to review all of the maps due to time constraints, they did provide effective images for orientation and analysis.

The following comments refer to Appendix D: CNFISH Strategy – INFISH Crosswalk.

- 1 • **Riparian Management Objectives** – Forested and non-forested systems.
 - The CNFISH Strategy currently reads "The BLM is encouraged to establish..." We recommend that it read "The BLM will include all 6 INFISH RMOs in the revised RMP and other RMOs (e.g., substrate) may be added."
- 2 • **RHCAs/RCA**
 - These acronyms are not in the list of acronyms.
- 3 • **RF2-c**
 - We would like to review the Transportation/Travel Management Plan as it becomes available.
- 4 • **RF-3c**
 - Remove the comma after obliterating.

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APR 14 2006

BUREAU OF LAND MANAGEMENT
COEUR D'ALENE ID 83814

Dirk Kempthorne/Governor
Steven M. Huffaker/Director

April 6, 2006

A5-1: BLM modified the CNFISH RMOs that appeared in the Draft RMP/EIS (see Appendix D of the Proposed RMP/EIS). The six INFISH RMOs are included in CNFISH, though some have been modified, and additional RMOs have been added. BLM made these changes to better reflect current information and science.

A5-2: Thank you for pointing out this oversight. The acronym list has been updated accordingly.

A5-3: We intend to keep Idaho Department of Fish and Game fully engaged with travel and transportation implementation planning.

A5-4: CNFISH has been revised to accommodate this request.

Comments

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- 5 | • **RF-4**
 - We recommend that the CNFish measure read the same as INFISH except replace retard with delay or prevent in line 11.
- 6 | • **GM-1**
 - We recommend that range project plans, allotment management plans, and annual plans of operation incorporate measures to protect waterways and riparian vegetation (e.g., fencing) from grazing livestock.
- 7 | • **GM-2, RM-1, LH-2, FW-2**
 - Replace retard with delay.
- 8 | • **FM-2**
 - Change the last sentence to, "Use an interdisciplinary team, including a fisheries biologist, during pre-suppression planning to predetermine incident base and helibase locations.
- 9 | • **FM-5**
 - We are uncertain why this conservation measure was deleted. Depending on the intensity and location of the burn area, it may be critical to develop a rehabilitation treatment plan to inhibit water temperature increases and excess sediment from being delivered to important streams and RCAs.
- 10 | • **LH-3**
 - We recommend that the CNFish measure read the same as INFISH except replace retard with delay or prevent in line 8.

The following comments (in italics) refer to Appendix I: Recommendations for Coordinating Land Management Activities with Elk Habitat Preferences. Although the guidelines (*The Guidelines for Evaluating and Managing Summer Elk Habitat in Northern Idaho* (Idaho Department of Fish and Game, 1984)) in this appendix are dated, they are still applicable.

Timber Harvest Recommendations

1. Any silvicultural method that changes the vegetation so that it no longer meets the definition of cover should be confined to an area with a maximum width of 1,000 feet and should be bordered on all sides by cover not less than 800 ft. width. *No changes.*
2. Clearcutting is usually preferred over other types of timber harvest techniques because it provides better forage and reduces the amount of future harvest activity in the area. *This recommendation is acceptable as long as recommendation 1 is followed.*
3. Maintain slash depth at less than 1.5 feet in order to minimize impact on elk movements, distribution and habitat use. *No changes.*
4. In appropriate habitat types, broadcast burn logging slash in the fall to get maximum elk forage protection. *Agreed.*

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5. Plan timber sales so maximum duration of disturbance in any one area is two years in succession. This can be accomplished with smaller sales, or scheduling larger sales by compartment in a certain sequence through contract stipulations. This would eliminate random logging over the entire sale area. *No changes.*
 6. Refrain from logging areas when elk would normally be using them, if feasible. For example, do not log important summer habitat during that season especially if a viable option is to log during the winter. *No changes.*
 7. If summer logging is planned on elk summer range, provide adjacent security areas at least as large as the area being disturbed for the animals to move to during periods of timber harvest and/or road building activity. Try to provide a ridge line between the disturbed area and security area. It is preferable to have several adjacent security areas available. *No changes.*
- Road Recommendations**
8. When major elk trails are bisected by roads, crossings should be provided across cut and fill slopes so they do not exceed natural gradients. This is especially necessary when cut slopes are over 8 ft. high and/or have a greater than ¼ to 1 slope. *No changes.*
 9. Vegetation removal along road sides should not extend any further from road edge than necessary for logging activities. *No changes.*
 10. Slash depths adjacent to roads in cleared rights-of-ways should not exceed 1.5 feet in depth. In areas where this level of slash disposal is impractical, openings 16 feet wide thru the slash at 200 foot intervals are recommended, especially on ridges and trail crossings. *Agreed.*
 - 11 | 11. Maintain a minimum 300 foot buffer strip between open forest roads and openings which serve as feeding areas. *Agreed.*
 - 12 | 12. Roads that are to remain open should avoid saddles, meadows, riparian areas, and ridge tops as these are usually major elk use areas. *Although a good suggestion, at times this may be difficult to adhere to; therefore, the guidelines for buffers and security areas should be enforced.*
 13. Design roads so they can be easily and effectively closed (either permanently or temporarily) at a low cost. *Permanent closures are the most effective protection for elk; however, closing historical roads is very controversial. New road construction should be temporary in nature and permanently closed/re-contoured when work is completed unless the new road is part of an extensive access management plan.*
 14. Install gates at onset of road building activity when the objective is to prevent human use patterns from becoming established. These gates should be closed and locked during any period of logging inactivity exceeding 24 hours. *Agreed.*

A5-5: CNFISH has been revised to accommodate this request.

A5-6: This conservation measure already states that range project plans, allotment management plans, and annual plans of operation would be developed revised and maintained to achieve RMOs. The RMOs include objectives for water temperature, water quality and riparian vegetation, so we would be protecting waterways and riparian vegetation. The conservation measure does not preclude the use of fencing to achieve the RMOs.

A5-7: CNFISH has been revised to accommodate this request.

A5-8: CNFISH has been revised to accommodate this request.

A5-9: BLM has added this conservation measure to CNFISH.

A5-10: CNFISH has been revised to accommodate this request.

A5-11: BLM will adhere to guidelines for buffers and security areas per recommendation #18.

A5-12: This guideline has been modified. See Appendix I.

Comments

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- 15. Inform the public by all types of news media, including signs on gates, about reasons for and dates of road closures. *Agreed.*
- 13 | 16. Replace gates with permanent barriers after logging activity where maximum elk security and habitat use is desired. *Although we appreciate permanent barriers, recontouring is the most effective way to protect elk habitat.*
- 17. Revegetate the driving surface as well as cut and fill slopes on permanently closed roads. *Agreed.*
- 14 | 18. Maintain buffer strips (that will qualify as hiding cover if possible) along roads left open during the normal elk use period. These buffers should be at least two sight distances wide when separating the road from an opening. *Agreed. You should define "site distance" though. For secure migration corridors we generally recommend retaining enough cover to hide to hide 90% of an elk at 200 feet.*
- Protecting Special Habitat Components**
- 19. Consult a wildlife biologist about the occurrence and/or importance of special habitat components on a case by case basis. *Agreed.*
- 15 | 20. Maintain the value of licks and wallows by buffering from disturbance for at least two site distances. *See comment #18*
- 16 | 21. Do not permit activities such as timber harvest, livestock grazing, or road building on established calving and rearing areas during the period of May 1 through July 15. *Will established calving and rearing areas be determined on an annual basis?*
- 17 | 22. Protect known major elk travel routes with buffer strips on either side for at least two site distances. *See comment #18*

Thank you for the opportunity to comment. We look forward to reviewing the Final draft when it becomes available.

Sincerely,



Charles E. "Chip" Corsi
Regional Supervisor

CEC:MTB:kh

C: Tracey Trent, NRPB Boise

File: BLM - RMP

A5-13: This guideline has been modified. See Appendix I.

A5-14: Change made as requested. Definition comes from Thomas et. al. (1979: p. 109).

A5-15: Change made as requested. Two site distances equal 400 feet.

A5-16: Currently, IDFG has not identified any calving and rearing areas on BLM-administered lands. The BLM will continue to consult with IDFG to identify new areas.

A5-17: Change made as requested. Two site distances equal 400 feet.

Comments

Responses

Comments	Responses