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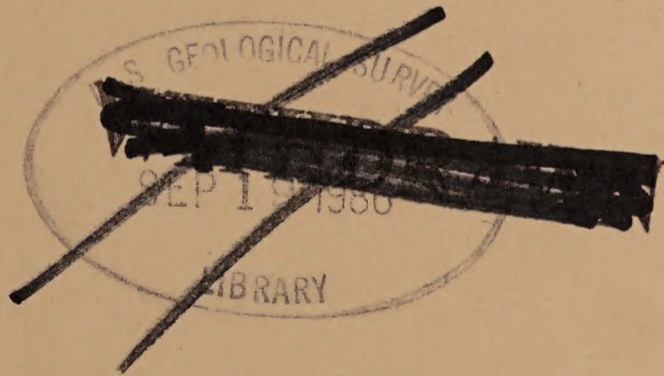
wilderness

FINAL

**ENVIRONMENTAL
IMPACT STATEMENT**

final

WILDERNESS



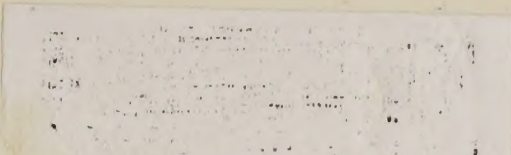
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BIG LOST/PAHSIMEROI WILDERNESS
ENVIRONMENTAL IMPACT STATEMENT

FINAL

Sam J. Woodard
Associate State Director

Prepared BY

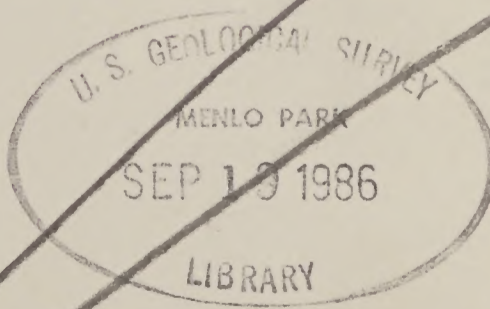
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BIG LOST/PAHSIMEROI
WILDERNESS ENVIRONMENTAL IMPACT STATEMENT

() Draft

(X) Final EIS

1. Type of Action: () Administrative (X) Legislative

2. Responsible Agencies:

a. Lead Agency: Department of Interior, Bureau of Land Management

b. Cooperating Agencies: None

3. Abstract: The Big Lost/Pahsimeroi Wilderness Environmental Impact Statement analyzes three Idaho Wilderness Study Areas (WSAs), two in the Idaho Falls District and one in the Salmon District, to determine resource impacts which could result from designation or nondesignation of these WSAs as wilderness. WSAs 31-14 Appendicitis Hill, 21,900 acres, 31-17 White Knob Mountains, 9,950 acres, and 45-12 Burnt Creek, 24,980 acres, are recommended as nonsuitable for wilderness designation.

4. Comments have been requested and received from the following:

See Reviewers and Respondents Section

5. Date Draft Statement Made Available to the Environmental Protection Agency and the Public:

Draft EIS: Filed 08/26/83

Final EIS:

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Denver CO 80225

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SUMMARY

This Environmental Impact Statement (EIS) analyzes the impacts resulting from designating or not designating three Wilderness Study Areas (WSAs) as wilderness. The proposed action recommends a nonwilderness designation for all three WSAs, including WSA 31-14, Appendicitis Hill (21,900 acres), WSA 31-17, White Knob Mountains (9,950 acres), and WSA 45-12, Burnt Creek (24,980 acres).

The Proposed Action in the Draft EIS was the result of land use decisions made in the Big Lost MFP (for Appendicitis Hill and White Knob Mountains), and the Ellis-Pahsimeroi MFP (for Burnt Creek). The Proposed Action in this Final EIS (FEIS) differs from that in the DEIS. The DEIS recommended 8,300 acres of Burnt Creek for wilderness designation. The FEIS Proposed Action recommends this acreage for nonwilderness uses. Therefore, if the Proposed Action in this EIS is accepted by Congress, this document will also serve as a part of the amendment process concerning the Burnt Creek WSA recommendation in the Ellis-Pahsimeroi MFP.

Alternatives considered for each of the WSAs were No Wilderness, No Action, Partial Wilderness, and All Wilderness. The No Action and No Wilderness Alternatives are combined because there is no measurable difference between the possible impacts of either. A Partial Wilderness Alternative for the White Knob Mountains WSA was not analyzed further because size adjustments would not significantly improve manageability, balance resource uses, or reduce conflicts.

The significant environmental issues developed in the study process common to all WSAs were: 1) impacts on wilderness values; 2) impacts on the development of energy and mineral resources; and 3) impacts on recreational off-road vehicle use. Two other issues were identified which concerned only the Appendicitis Hill WSA. These were: 1) impacts on mule deer winter range, and 2) impacts on timber management. Livestock grazing, which is recognized by Congress as an acceptable activity within wilderness areas, would continue under existing plans. Subject to valid existing rights, present law would withdraw any designated wilderness from appropriation under the mining laws effective the date of designation.

CHAPTER 1

INTRODUCTION AND PLANNING PROCESS

Purpose and Need

The purpose of the proposed action is to manage 56,830 acres within three wilderness study areas (WSAs) for uses other than wilderness. The three WSAs include 31-14 Appendicitis Hill (21,900 acres), 31-17 White Knob Mountains (9,950 acres), and 45-12 Burnt Creek (24,980 acres). The proposed action differs from that described in the Draft Big Lost/Pahsimeroi Wilderness Environmental Impact Statement (EIS), in that the draft proposed to manage and preserve wilderness characteristics on 8,300 acres of the Burnt Creek WSA. The proposed action was changed to manage this acreage for nonwilderness uses. If the Proposed Action in this EIS is accepted by Congress, this document will also serve as a part of the process amending the wilderness decision concerning the Burnt Creek WSA in the Ellis-Pahsimeroi MFP.

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

The three WSAs being studied are covered by two Management Framework Plans (MFPs); these are the Big Lost MFP and the Ellis-Pahsimeroi MFP. The WSAs are listed in Table 1 below.

Table 1
List of Wilderness Study Areas

<u>Name</u>	<u>Number</u>	<u>Acreage</u>	<u>MFP</u>
Appendicitis Hill	ID-31-14	21,900	Big Lost
White Knob Mountains	ID-31-17	9,950	Big Lost
Burnt Creek	ID-45-12	24,980	Ellis-Pahsimeroi

Location

The WSAs are located in east central Idaho near Arco, Idaho (Maps 1 & 2). WSAs 31-14 and 31-17 are five and ten miles northwest of Arco respectively. WSA 45-12 is thirty-five miles north-northwest of Arco and east of Borah Peak, the highest point in Idaho.

Environmental Issue Identification/Scoping

The scoping process for the Big Lost/Pahsimeroi Wilderness Environmental Impact Statement encompassed issues identified by the BLM staff, the public, and government agencies at all levels. Scoping occurred throughout the development of the Big Lost and the Ellis-Pahsimeroi Management Framework Plans (MFPs). Numerous meetings were held with individuals, interest groups, industry representatives, and governmental agencies. Open houses were held in May, Idaho (05/06/81 and 09/30/81), Arco, Idaho (08/09/82) and Mackay, Idaho (09/01/82).

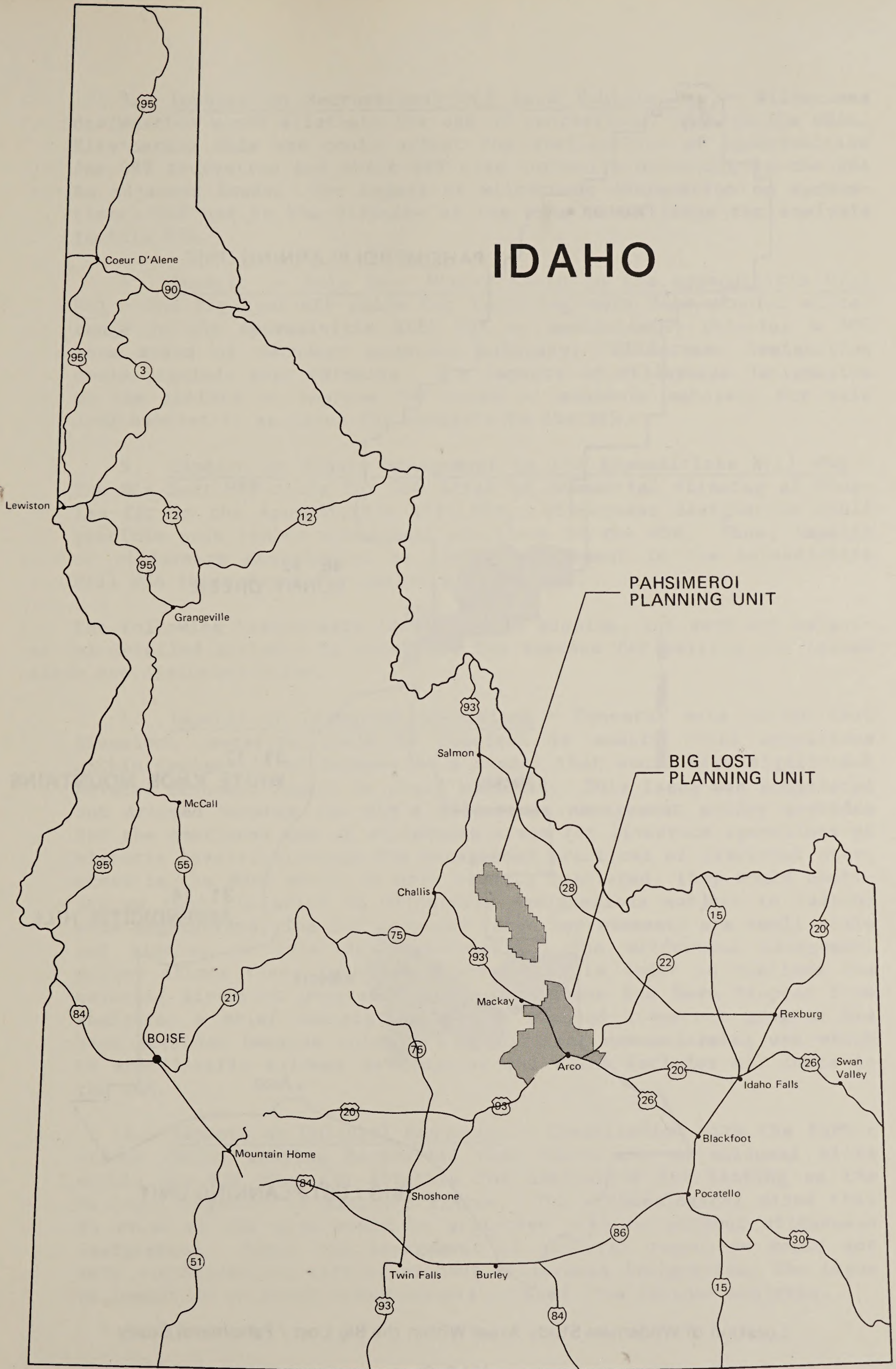
The draft Big Lost/Pahsimeroi Wilderness EIS was released for public review and comment on August 25, 1983. The formal comment period was open until October 27, 1983. Public hearings were held at Arco, Idaho (09/26/83) and Challis, Idaho (09/27/83). As a result of the public review, an additional alternative was identified for Appendicitis Hill, in which 13,670 acres of the WSA were identified for management as wilderness. This alternative is analyzed herein.

During the scoping process consultation continues with the Idaho State Historic Preservation Officer (SHPO) concerning the presence or absence of sites in the WSA that would be eligible for nomination for listing on the "National Register of Historic Places". Consultation with the U.S. Fish and Wildlife Service concerning threatened and endangered species has occurred. The environmental issues selected for analysis in this EIS follow:

1. Impacts on Wilderness Values - The wilderness values of naturalness, solitude, and primitive recreation could benefit from wilderness designation. The same values may be adversely affected by uses and actions that would occur should the WSA not be designated wilderness. The significance of these beneficial or adverse impacts is an issue for analysis in the EIS.

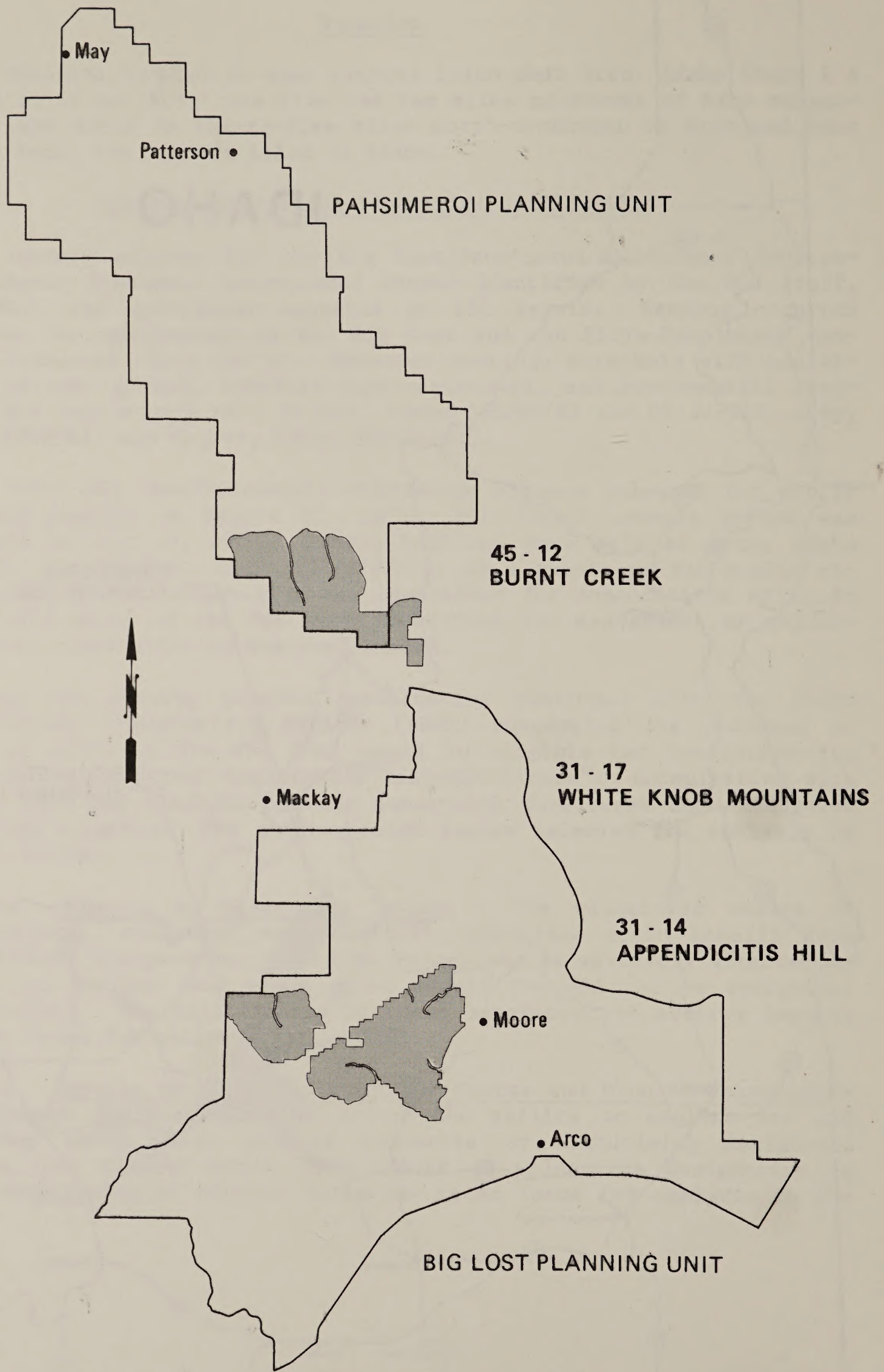
2. Impacts on the Development of Energy and Mineral Resources - Wilderness designation could affect the ability to explore for and develop undiscovered mineral resources by withdrawing designated lands from mineral entry. The effect of wilderness designation on the development of mineral resources is an issue for analysis in the EIS.

IDAHO



GENERAL LOCATION MAP

MAP 1



Location of Wilderness Study Areas Within the Big Lost / Pahsimeroi Study

MAP 2

3. Impacts on Recreational Off Road Vehicle Use - Wilderness designation would eliminate the use of recreational ORVs in the WSAs. Eliminating this use could affect the availability of opportunities for ORV recreation and shift ORV uses currently occurring in the WSA to adjacent lands. The impact of wilderness designation on recreational ORV use in the vicinity of the WSAs is an issue for analysis in this EIS.

4. Impacts on Mule Deer Winter Range in the Appendicitis Hill WSA - The Big Lost MFP calls for improving mule deer crucial winter range in the Appendicitis Hill WSA by mechanically thinning a 500 acre stand of decadent mountain mahogany. Wilderness designation could preclude such thinning. The impacts of wilderness designation on the ability to improve 500 acres of mountain mahogany for mule deer habitat is an issue for analysis in the EIS.

5. Impacts on Timber Management in the Appendicitis Hill WSA - The Big Lost MFP calls for 300 acres of commercial thinning of Douglas fir in the Appendicitis Hill WSA. Wilderness designation could preclude such timber management practices in the WSA. Thus, impacts of wilderness designation on timber management in the Appendicitis Hill WSA is an issue for analysis in the EIS.

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

1. Impacts on Livestock Operations - Concerns were raised that livestock operators could be required to modify their operations within designated wilderness in a manner that would have significant adverse economic impact on their business. This issue was considered but dropped because the BLM's wilderness management policy provides for the continued use of wilderness areas for livestock operations at historic levels. Although the management practices of livestock operators in the WSAs would be more closely regulated, they would continue as they did prior to wilderness designations subject to reasonable regulations. The few proposed range improvements are small scale and similar to existing improvements. The wilderness management policy allows these types of improvements in order to continue the existing livestock program. While this issue has been dropped from analysis, a brief description of the planned livestock program has been included because this is a significant nonconforming use which is specifically allowed by Congress and which includes all lands in the WSA.

2. Impacts on Cultural Resources - Consultation with the SHPO's office during scoping determined that there are no cultural sites within the WSA that are eligible for nomination for listing on the National Register of Historic Places. The archaeological sites that do exist in the area would be protected with or without wilderness designation. Since the management of cultural resources would not vary significantly, with or without wilderness designation, the issue of impact to cultural resources was dropped from further analysis.

3. Impacts on Water Quality - Concerns were raised regarding how water quality would be effected by wilderness designation or nondesignation in each of the WSAs. This was dropped from analysis in the EIS because the primary influence on water quality in these WSAs (livestock use) would not vary sufficiently with either designation or nondesignation. Other activities such as planned commercial thinning of Douglas fir and potential mineral development are absent or would affect such a small area that their influence on water quality would be negligible.

4. Impacts on Endangered Species - In a 1980 survey for threatened or endangered plants in the BLM's Big Lost and Mackay Planning Units (an area which encompasses all three WSAs), no threatened or endangered plants were found. There has been one unconfirmed sighting of a peregrine falcon in the Appendicitis Hill WSA and one confirmed sighting of a peregrine falcon in the Burnt Creek WSA. Based on estimates by BLM wildlife biologists, however, there are no resident populations of peregrine falcons in the WSAs. Therefore, this issue was dropped from further analysis.

5. Impacts on Wildlife - General concerns regarding impacts of wilderness designation or nondesignation on wildlife were raised during the formal comment period. The Idaho Department of Fish and Game noted that the partial wilderness alternative for the Burnt Creek WSA would benefit wildlife. This issue was dropped from further consideration in the EIS because projected developments in the three WSAs would not result in any significant change to any specific wildlife population or habitat, with or without wilderness designation, except where noted in the issues selected for analysis. None of the projected oil and gas development or range projects fall within the 8,300 acres originally proposed for wilderness in the Draft EIS.

6. Impacts on Forest Management - An issue dealing with the effect of wilderness designation on forest management in the Burnt Creek WSA and White Knob Mountains WSA was considered but not included in this EIS. White Knob Mountains contain no commercial timber. Burnt Creek does have 429 acres of commercial timber, but the timber is expected to remain uneconomical to harvest for at least the next twenty years and possibly longer if the current balance between supply, demand, and cost structure remains consistent. No timber sales are planned for these two WSAs so forest management was dropped as an issue.

The Planning Process, Selection of the Proposed Action and Development of Alternatives

The Planning Process and Selection of the Proposed Action

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

The proposed action (Map 3) recommends nonwilderness designation for three WSAs totaling 56,830 acres. The WSAs include Appendicitis Hill (21,900 acres), White Knob Mountains (9,950 acres), and Burnt Creek (24,980 acres). This proposed action differs from the proposed action in the draft Big Lost/Pahsimeroi Wilderness EIS in that the draft proposed to recommend 8,300 acres of Burnt Creek for wilderness designation. The proposed action was changed to manage the Burnt Creek WSA for nonwilderness uses.

Alternatives to the Proposed Action Selected for Analysis

A range of alternatives from resource protection to resource production was formulated and evaluated for the three WSAs. The alternatives assessed in this EIS include: 1) a no wilderness alternative for each WSA; 2) an all wilderness alternative for each WSA; and 3) a partial wilderness alternative for Appendicitis Hill and Burnt Creek.

The partial wilderness alternative for Appendicitis Hill is an additional alternative that was not analyzed in the draft EIS. Public comment on the draft supported consideration of the Appendicitis Hill WSA with boundary adjustments to eliminate lands that are accessible to motorized vehicles. The adjusted boundary was suggested by the Committee for Idaho's High Desert and is included in this alternative.

In this document, the no action alternative as required by NEPA, and the no wilderness alternative are equivalent. Both advocate a continuation of current management framework plans.

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

Partial wilderness alternatives can make recommendations ranging between the no wilderness and all wilderness alternatives. A partial wilderness alternative can recommend for designation something less than the entire acreage of the WSA.

Alternatives Considered But Dropped from Analysis

Burnt Creek

An additional partial alternative was suggested by Scott Ploger, President of the East Idaho Chapter of the Committee for Idaho's High Desert. The intent of his alternative is to include the major ridgelines in the wilderness area in order to protect scenic views. This proposal was reviewed by BLM in the field. It was felt that it is impossible to separate the ridgelines from their foothills and lower slopes. Disturbed lower slopes would not only ruin the view from, but the view of the ridgelines proposed for protection. Consequently, it is felt by BLM that this proposal would not improve the quality of wilderness values and if modified to do so it would be equal to the All Wilderness Alternative.

White Knob Mountains

A partial wilderness alternative that would recommend for wilderness something less than the entire acreage of this WSA was considered by BLM but dropped because no boundary was found that would significantly reduce resource conflicts, improve the quality of the wilderness values, or improve the WSA's manageability while maintaining essential wilderness values.

CHAPTER 2

PROPOSED ACTION AND ALTERNATIVES

Since the pattern of future actions cannot be predicted with certainty, assumptions must be made to allow impact analysis to be performed. These assumptions are the basis of the scenarios developed in this impact statement. They are not management plans or proposals, but are believed to represent reasonable patterns of activities which could occur as a result of this action.

APPENDICITIS HILL

Proposed Action (No Wilderness Alternative)

All 21,900 acres of this WSA would be recommended for nonwilderness (Map 4). The lands would be open for multiple use management and development.

Livestock and Range Actions

The WSA would continue to provide 2,300 AUMs for livestock use. Projections beyond existing planning estimates would not change maintenance activities or call for additional construction of livestock and range facilities. Maintenance would continue on 14 existing stock watering sites (including troughs, tanks, and small earthen reservoirs). New range improvements consisting of 500 acres of sagebrush control, one spring development, and one pond are planned. Projections beyond existing planning estimates (beyond the 15 to 20 year planning cycle) indicate that it is reasonable to expect that 2,300 AUMs of use would be maintained in the future.

Wildlife Management Actions

Five hundred contiguous acres of decadent mountain mahogany would be pruned and thinned with chainsaws to stimulate new growth, thereby increasing crucial winter forage for mule deer. Over the long term, the mule deer population would be increased by 30 percent. Prunings and cut trees would be left where they fell.

Energy and Mineral Resource Actions

It is assumed that three gravel pits that had been used in the past would be reactivated. These pits are on the edge of the WSA and all are next to existing roads or ways. No new road construction is anticipated. Material would be removed in conjunction with county road maintenance on an as-needed basis. There would be 15 acres of surface disturbance from these three pits.

While the entire WSA would be open to mineral entry, projections beyond existing planning estimates indicate that no new mining claims would be explored in the next 15 to 20 years. Further, no drilling for oil and gas is anticipated.

Recreation Management Actions

The Big Lost MFP limits ORV use in the Appendicitis Hill WSA to existing roads and trails. This designation would continue under the proposed action. Recreational ORV use is projected to remain below 50 visitor days annually for the next 5 to 10 years. Projections beyond the existing planning cycle (15 to 20 years) indicate that it is reasonable to expect recreational ORV use to increase slightly, but remain below 100 visitor days annually. Three miles of road constructed for timber harvest on the west side of the WSA is expected to be constructed at some time in the future.

The entire WSA would be open for other recreation activities including hunting, horseback riding (generally associated with hunting activities), camping (generally associated with hunting activities), photography and sightseeing. No recreation facilities or developed trails exist in the WSA and none are planned. However, the three miles of road associated with timber harvest would be used by hunters to gain access to the western portion of the WSA. Recreational use for these activities would remain below 100 visitor days for the next ten years. Projections beyond existing planning estimates (beyond the 15 to 20 year planning cycle) indicate that it is reasonable to expect that recreational use for these activities would increase slightly, but remain below 200 visitor days annually for the foreseeable future.

Forest Management Actions

The Big Lost MFP identified 300 acres of Douglas fir for commercial thinning. Interest by Louisiana Pacific has been expressed for this sale. Thus, it is assumed that under the proposed action (no wilderness alternative), this area would be logged, resulting in the extraction of 325 MBF (thousand board feet) of timber. One mile of main logging road and two miles of skid road would be constructed. One additional mile of existing vehicle way would be improved as part of the main logging road. Logging would be done predominantly by a cable logging system.

Partial Wilderness Alternative

Under this alternative, 13,670 acres would be recommended for wilderness and 8,230 acres would be recommended for nonwilderness (see Map 4).

Livestock and Range Actions

See Proposed Action.

Wildlife Management Actions

Under the Partial Wilderness Alternative, thinning of mountain mahogany would not occur. The area identified for thinning lies within the designated wilderness portion of the WSA. Thus, 500 acres of crucial winter range for mule deer would not be improved, and the mule deer population would decrease 30 percent in the long term because of loss of habitat.

Forest Management Actions

Under this alternative, timber management practices would be minimal because all the commercial timber lies within the designated wilderness portion of the WSA, including the 300 acres identified for commercial thinning. No tree cutting, especially timber harvest, would be allowed.

Energy and Mineral Resource Actions

It is assumed that three gravel pits that had been used in the past would be reactivated. These pits are located outside the area recommended for wilderness designation under this alternative. All three of these pits are next to existing roads, so no new road construction is anticipated. There would be 15 acres of surface disturbance from these three pits. Material would be removed in conjunction with county road maintenance on an as-needed basis.

The 13,670 acres recommended for wilderness under this alternative would, subject to valid existing rights, be withdrawn from all forms of appropriation under the mining laws upon designation by Congress. The remaining 8,230 acres would be open to mineral entry. However, projections beyond existing planning estimates indicate that no new mining claims would be explored in the next 15 to 20 years. Further, no oil and gas drilling is anticipated.

Recreation Management Actions

The 13,670 acres recommended for wilderness would be closed to ORV use, once designated by Congress. On the remaining 8,230 acres, ORV use would be limited to existing roads and trails as specified in the Big Lost MFP. Recreational ORV use in the 8,230 acres of nonwilderness is projected to remain below 40 visitor days annually for the next 5 to 10 years. Projections beyond the existing planning cycle (15 to 20 years) indicate that it is reasonable to expect recreational ORV use to increase slightly but remain below 100 visitor days annually.

The entire WSA would be open for other recreation activities including hunting, horseback riding (generally associated with hunting activities), camping (generally associated with hunting activities), photography and sightseeing. Recreational use for these activities would remain below 100 visitor days for the next ten years. Projections beyond existing planning estimates (beyond the 15 to 20 year planning cycle) indicate that it is reasonable to expect that recreational use for these activities would increase slightly, but remain below 200 visitor days annually.

for the foreseeable future. Future recreational use would be expected to be oriented towards the designated wilderness area rather than the lands managed for nonwilderness uses. No recreation facilities or developed trails exist in the WSA and none are planned.

All Wilderness Alternative

All 21,990 acres of the WSA would be recommended for wilderness designation.

Livestock and Range Actions

See Proposed Action.

Wildlife Management Actions

Under the All Wilderness Alternative, thinning mountain mahogany would not be allowed. The BLM's Wilderness Management Policy specifically prohibits cutting of trees, shrubs, or other vegetative products for non-wilderness purposes. Thus, 500 acres of crucial winter range for mule deer would not be improved, and the mule deer population would decrease by 30 percent in the long term because of loss of habitat.

Energy and Mineral Resource Actions

All 21,990 acres of the WSA would be withdrawn from all forms of appropriation under the mining laws, subject to valid existing rights at the time of wilderness designation.

Recreation Management Actions

The entire WSA would be closed to ORV use, unless such use would be required for maintenance of livestock facilities or livestock operations.

The entire WSA would be open for other recreation activities including hunting, horseback riding (generally associated with hunting activities), camping (generally associated with hunting activities, photography and sightseeing. Recreational use for these activities would remain below 100 visitor days for the next ten years. Projections beyond existing planning estimates (beyond the 15 to 20 year planning cycle) indicate that it is reasonable to expect that recreational use for these activities would increase slightly, but remain below 250 visitor days annually for the foreseeable future. No recreation facilities or developed trails exist in the WSA and none are planned.

Forest Management Actions

Timber management practices would be minimal under the All Wilderness Alternative. No tree cutting, especially timber harvest would be allowed. Reforestation, in the absence of natural revegetation, would be prohibited.

WHITE KNOB MOUNTAINS

Proposed Action (No Wilderness Alternative)

All 9,950 acres of the White Knob Mountains WSA would be recommended for nonwilderness (Map 5). The lands would be open for multiple use management and development.

Livestock and Range Actions

The WSA would continue to provide 852 AUMs for livestock use. Projections beyond existing planning estimates (beyond the 15 to 20 year planning cycle) indicate that it is reasonable to expect that 852 AUMs would be maintained in the future.

Maintenance would continue on 5 spring developments and watering troughs. New range improvements consisting of 880 acres of sagebrush control, two miles of pipeline with one spring development and one trough, and eleven stock watering ponds are planned. Projections beyond existing planning estimates would not change maintenance activities or call for construction of additional livestock or range facilities.

Energy and Mineral Resource Actions

It is assumed that three existing lode mining claims along the WSA's eastern boundary would be explored, resulting in one mile of new road and 60 acres of surface disturbance. One gravel pit along the WSA's southwestern boundary would continue to be used as a gravel source for country road maintenance. This would result in five acres of surface disturbance.

Further, it is assumed that there would be one exploratory oil and gas well drilled in Schoolhouse Canyon. In support of this well, there would be two miles of new road constructed and 10 acres of surface disturbance.

Recreation Management Actions

The entire 9,950 acres of the WSA would be open to ORV use. Recreational ORV use is projected to remain below 50 visitor days annually for the next 5 to 10 years. Projections beyond the existing planning cycle (15 to 20 years) indicate that it is reasonable to expect recreational ORV use to increase slightly but remain below 100 visitor days annually. Three miles of road associated with mineral development and oil and gas drilling is expected to be constructed at some time in the future.

The entire WSA would be open for other recreation activities including hunting, horseback riding (generally associated with hunting), camping (generally associated with hunting), photography, and sightseeing. No recreation facilities or developed trails exist in the WSA and none are planned. However, the three miles of road associated with oil and gas drilling and mineral development would be used by hunters to gain

access to the northeast portion of the WSA. Recreation use for these activities would remain below 50 visitor days for the next ten years. Projections beyond existing planning estimates (beyond the 15 to 20 year planning cycle) indicate that it is reasonable to expect recreation use for these activities would increase slightly, but remain below 150 visitor days annually for the foreseeable future.

All Wilderness Alternative

All 9,950 acres of the White Knob Mountains WSA would be recommended for wilderness (Map 5).

Livestock and Range Actions

See Proposed Action.

Energy and Mineral Resource Actions

Subject to valid existing rights at the time of designation, all 9,950 acres of the WSA would be withdrawn from all forms of appropriation under the mining laws. No oil and gas drilling would be allowed in the WSA.

The three existing lode mining claims that are expected to become active under the Proposed Action (No Wilderness Alternative) are considered valid existing rights. However, the BLM's Wilderness Management Policy states that prior to commencing operations, a formal validity examination must occur to determine whether or not the claims in question indeed held sufficient quantity and quality of material so that a prudent man could expect to get a reasonable return on his investment. For purposes of analysis, it is assumed that such an examination would show insufficient quantity and quality of material to satisfy the prudent man concept. Thus, the claims would be deemed null and void, and no mining development would be allowed.

Recreation Management Actions

The entire 9,950 acres of the WSA would be closed to ORV use, unless such use would be required for maintenance of livestock facilities or operations. The WSA would be open for other recreation activities including hunting, horseback riding (generally associated with hunting), camping (generally associated with hunting), photography, and backpacking. Recreation use for these activities would remain below 50 visitor days for the next ten years. Projections beyond existing planning estimates (beyond the 15 to 20 year planning cycle) indicate that it is reasonable to expect recreation use to increase slightly but remain below 150 visitor days annually. No recreation facilities or trails exist in the WSA and none are planned.

BURNT CREEK

Proposed Action (No Wilderness Alternative)

All 24,980 acres of this WSA would be recommended for nonwilderness (Map 6). The lands would be open for multiple use management and development.

Livestock and Range Actions

The WSA would continue to provide 3,034 AUMs for livestock use. Projections beyond existing planning estimates indicate that livestock use would remain at that level for the foreseeable future. Eight miles of fence and 5 developed springs would continue to be maintained in support of the livestock management program. New improvements consisting of three miles of pipeline, four troughs, seven reservoirs, and 10 miles of fence are planned. Projections beyond existing planning estimates indicate no change in maintenance activities and no additional range facilities.

Energy and Mineral Resource Actions

It is assumed that one exploratory oil and gas well would be drilled in the Short Creek drainage. This would result in one mile of new road being built and 10 acres of surface disturbance for the drilling equipment. While the entire WSA is open to mineral entry, no mining claims currently exist in the area and projections beyond existing planning estimates indicate that no new claims would be filed in the foreseeable future.

Recreation Management Activities

The Ellis-Pahsimeroi MFP limits ORV use in the WSA to existing roads and trails. This designation would continue under the proposed action. Recreational ORV use is projected to remain below 100 visitor days annually for the next 5 to 10 years. Projections beyond that point indicate that it is reasonable to expect ORV use to increase slightly but remain below 200 visitor days annually for at least the next 20 years. One mile of new road associated with oil and gas drilling in the Short Creek drainage is expected to be constructed at some time in the future.

The entire WSA would be open for other recreation activities including hunting, horseback riding, camping, photography, fishing, hiking, and backpacking. No recreation facilities or trails exist in the WSA and none are planned. However, the mile of new road associated with oil and gas drilling would be used by hunters to gain access in the central portion of the WSA. Recreation use for these activities would remain below 100 visitor days for the next ten years. It is reasonable to expect modest increases in recreation use over time, but projections beyond existing planning estimates (15 to 20 years) indicate use would remain below 200 visitor days annually.

Partial Wilderness Alternative

The Partial Wilderness Alternative recommends 8,300 acres of the Burnt Creek WSA for wilderness and 16,680 acres for nonwilderness (see Map 6).

Livestock and Range Actions

See Proposed Action.

Energy and Mineral Resource Actions

Subject to valid existing rights at the time of designation, the area recommended for wilderness would be withdrawn from all forms of mineral entry and leasing. One exploratory oil and gas well would be expected to be drilled in the Short Creek drainage, within the area recommended nonsuitable. This would result in one mile of new road and 10 acres of surface disturbance.

The area recommended nonsuitable would remain open for mineral entry and leasing. However, no mining claims presently exist in that area and projections indicate that none are likely to occur in the foreseeable future.

Recreation Management Actions

The 8,300 acres recommended for wilderness would be closed to ORV use, once designated by Congress. On the nonsuitable 16,680 acres, ORV use would be limited to existing roads and trails as specified in the Ellis/Pahsimeroi MFP. Recreational ORV use in the 16,680 acres of nonwilderness is projected to remain at below 40 visitor days annually for the next 5 to 10 years.

All Wilderness Alternative

The All Wilderness Alternative recommends the entire 24,980 acres of the Burnt Creek WSA for wilderness (Map 6).

Livestock and Range Actions

See Proposed Action.

Energy and Mineral Resource Actions

All 24,980 acres of the WSA would be withdrawn from mineral entry and leasing, subject to valid existing rights at the time of wilderness designation.

Recreation Management Actions

The entire 24,980 acre WSA would be closed to ORV use, once the area was designated by Congress, unless such use would be required for maintenance of livestock facilities or livestock operations.

The entire WSA would be open for other recreation activities including hunting, horseback riding (generally associated with hunting activities), camping (generally associated with hunting activities), photography and sightseeing. Recreational use for these activities would remain below 100 visitor days for the next ten years. Projections beyond existing planning estimates (beyond the 15 to 20 year planning cycle) indicate that it is reasonable to expect that recreational use for these activities would increase slightly, but remain below 250 visitor days annually for the foreseeable future. No recreation facilities or developed trails exist in the WSA and none are planned.

TABLE 2
COMPARATIVE IMPACT SUMMARY

WSA	WILDERNESS VALUES	MINERAL RESOURCES	ORV USE	MULE DEER WINTER RANGE ^{1/}	FORESTRY ^{1/}
<u>Appendicitis Hill</u>					
Proposed Action (No Wilderness)	Naturalness and Solitude lost or impaired on 1,515 acres in short-term; long-term loss or impairment on 1,315 acres. No legal protection of wilderness values on 21,900 acres.	21,900 acres open to mineral entry and leasing.	Minor increase in vehicle accessibility; no significant impacts. ORVs limited to existing roads and ways on 21,900 acres.	500 acres of winter range improved by mechanically thinning decadent mountain mahogany. Population increased by 30 percent (360 deer).	300 acres (325 MRF) of Douglas-fir commercially thinned; logging on remaining 570 acres of commercial forest land unlikely in foreseeable future.
Partial Wilderness	Wilderness values retained on 13,670 acres. No legal protection on 6,230 acres, but no development or impairing use is anticipated on this portion. Impacts to solitude and naturalness would not occur on 1,315 acres.	13,670 acres closed to mineral entry or leasing. 8,230 acres open to mineral entry and leasing.	15 visitor days annually would be displaced from 13,670 acres closed to ORVs. Insignificant impact due to similar or superior opportunities on nearby public land. ORV use limited to existing roads and ways on 8,230 acres.	500 acres of winter range improvement foregone. Long-term reduction of mule deer population by as much as 30% (360 deer).	325 MRF harvest foregone. Logging on remaining 570 acres of commercial forest land also foregone, but sales are unlikely in the foreseeable future.
All Wilderness	Wilderness values retained on 21,900 acres. Impacts to solitude and naturalness would not occur on 1,315 acres.	21,900 acres closed to mineral entry or leasing.	50 visitor days annually displaced from 21,900 acres closed to ORVs; insignificant impact due to similar or superior opportunities on nearby public land.	500 acres of winter range improvement foregone; long-term reduction of mule deer population by as much as 30% (360 deer).	325 MRF harvest foregone. Logging on remaining 570 acres of commercial forest land also foregone, but sales are unlikely in the foreseeable future.
<u>White Knob Mountains</u>					
Proposed Action (No Wilderness)	Naturalness and solitude lost or impaired on 980 acres. No legal protection of wilderness values on 9,950 acres.	9,950 acres open to mineral entry and leasing.	Minor increase in vehicle accessibility; 9,950 acres open to ORVs. No significant impacts.		
All Wilderness	Wilderness values retained on 9,950 acres; impacts to solitude and naturalness would not occur on 980 acres.	9,950 acres closed to mineral entry and leasing.	50 visitor days annually displaced from 9,950 acres closed to ORVs; insignificant impact due to similar or superior opportunities on nearby public land.		
<u>Burnt Creek</u>					
Proposed Action (No Wilderness)	Naturalness and solitude lost or impaired on 975 acres; no legal protection of wilderness values on 24,980 acres.	24,980 acres open to mineral entry and leasing.	Very minor increase in vehicle accessibility; no significant impacts. ORVs limited to existing roads and ways on 24,980 acres.		
Partial Wilderness	Wilderness values retained on 8,300 acres; no legal protection on 16,680 acres. Naturalness and solitude lost or impaired on 975 acres.	16,680 acres open to mineral entry and leasing. 8,300 acres closed to mineral entry and leasing.	35 visitor days annually displaced from 8,300 acres closed to ORV use; insignificant impact due to similar or superior opportunities on nearby public land. ORV use limited to existing roads and ways on 16,680 acres.		
All Wilderness	Wilderness values retained on 24,980 acres. Impacts to solitude and naturalness would not occur on 974 acres.	24,980 acres closed to mineral entry and leasing.	100 visitor days annually displaced from 24,980 acres closed to ORV use; insignificant impact due to similar or superior opportunities on nearby public land.		

^{1/} This issue relevant to Appendicitis Hill WSA only.

CHAPTER 3

AFFECTED ENVIRONMENT

APPENDICITIS HILL

General Characteristics

The Appendicitis Hill WSA is generally triangular in shape, containing 21,900 acres of public land with a 640 acre state inholding. The WSA is located five miles northwest of Arco, Idaho.

The WSA lies between the Antelope Creek and Big Lost River drainages and contains several intermittent streams. The area is mountainous, with Crawford Peak rising to 8,523 feet, 2,900 feet above Antelope Valley. Lower elevation hills are generally rounded with a vegetative cover consisting of sagebrush and grass. Several canyons contain impressive rock outcrops and caves. High, north facing slopes support concentrated stands of Douglas fir; chokecherry and mountain mahogany can be found on south slopes and canyon walls. Stands of aspen accompanied by willows grow in Newman and Chokecherry Canyons.

Wilderness Values

Naturalness. The most apparent changes to the WSA's natural character are vehicle ways and livestock watering sites. Eighteen miles of roads and ways enter the WSA from all sides, while 14 water developments (troughs, springs, and ponds) are distributed throughout. Visitors would encounter these human-caused imprints as they travel into 15 of the WSA's canyons.

The WSA's large size and good topographic and vegetative screening tend to decrease the overall effects of impacts to naturalness. While essentially retaining its natural character, most human-caused imprints in the WSA are located along routes a visitor would normally travel.

Solitude. Two factors contribute to the WSA's outstanding opportunities for solitude. First, the WSA's 21,900 acres is of a size sufficient to offer a visitor space and distance from others. Second, 90 percent of the WSA is steep and dissected with intermittent drainages that provide seclusion, and contributes to a visitor's chances of avoiding others.

Primitive and Unconfined Recreation. The Appendicitis Hill WSA offers outstanding primitive recreation opportunities including hiking, backpacking, hunting, wildlife observation, photography, and sightseeing. The steep and rugged terrain makes these recreation activities challenging. Both day and overnight trips can be taken among the canyons, peaks, and other points of interest. Scenic views of the surrounding mountain ranges, valley floor, and lava plain are excellent from the WSA's high ridges and peaks. Large and small mammals and numerous bird species also offer attractions to the primitive recreationist. The WSA lacks any significant feature which would be a focal or destination post for visitors.

Special Features. The WSA's most important special feature is the presence of crucial winter range for approximately 1,200 mule deer and 100 elk.

Recreational Off Road Vehicle Use

Recreational ORV use in the Appendicitis Hill WSA is estimated to be 50 visitor days annually, generally associated with hunting. The Big Lost MFP restricts ORVs to existing roads and ways. The number of these travel routes into the WSA (12 roads and ways totaling 18 miles) allows for vehicle access into the major drainages of the WSA, including Newman Canyon and Chokecherry Canyon.

Energy and Mineral Resources

Except for the 640 acre state inholding, all surface and mineral estates in the WSA are in federal ownership and are open to mineral entry and leasing.

The Appendicitis Hill WSA has been classified as having moderate favorability for oil and gas (BLM GEM, 1983). The basis of this classification is the structural setting of the WSA including excellent potential for the development of traps, indications of subsurface structures from private geophysical data, the presence of potential hydrocarbon source and reservoir beds in the stratigraphic section, and a favorable thermal history of the source rocks. All but the most eastern portion of the WSA is covered by oil and gas leases granted after 1976.

Most of the Appendicitis Hill WSA is rated as being unfavorable for geothermal resources (BLM GEM, 1983). This classification is based on analogy with similar areas in the Idaho Basin and Range geothermal province and the high elevations present, combined with the absence of major faults or lineaments. The portions of the WSA along Antelope Creek and Lost River Valleys are classified as having low favorability for geothermal resources. This classification is based on proximity to the northern margin of the Snake River Plain, the existence of a range-boundary fault along the east side of the WSA, and the presence of a major lineament along Antelope Creek.

The WSA is classified as having low favorability for other leasable resources, including phosphate, bitumen, and asphalt. The lack of known occurrences in, and the generally unfavorable geologic environment of the WSA leads to the low classification.

The Appendicitis Hill WSA is rated as having low to moderate favorability for metallic minerals, including lead, zinc, silver, and copper (BLM GEM, 1983). The low rating is assigned because of the low level of detail of published geologic mapping and the lack of geochemical and geophysical data. Within the WSA, there are three mineral occurrences, consisting of prospect pits or shafts. The mineral content of these occurrences is unknown.

Lastly, the Appendicitis Hill WSA is classified as having moderate favorability for common varieties of limestone, with potential for building stone and aggregate production. There are 11 known occurrences of sand and gravel on the border of, or just outside the WSA. Use of these areas as sources of sand and gravel is localized; use occurs primarily in conjunction with county road maintenance.

Mule Deer Winter Range

Winter range of mule deer is an important wildlife value within the Appendicitis Hill WSA. There are about 1,200 mule deer inhabiting the area during winter months. The deer concentrate in the southern slopes and feed mainly on mountain mahogany and sagebrush. Mountain mahogany is a tree-like shrub growing to an average height of 7 feet, valuable as winter forage because its leathery, gray-green leaves contain a high level of protein. New growth on the trees is most desirable, due to its palatability. Most of the mahogany stands are overmature with older growth being over-utilized and with little production of new growth.

Forestry Resources

The Appendicitis Hill WSA has 2,100 acres of forested land of which 870 acres are classified as commercial timber. The main commercial tree is Douglas fir. The average age of these trees is over 250 years and average diameter is 15 inches. Spruce budworm and Douglas fir bark beetle are infecting all stands. The commercial timber is located to the southeast of Crawford Peak with the remaining acreage of noncommercial timber in small stands scattered throughout the WSA.

WHITE KNOB MOUNTAINS

General Characteristics

The White Knob Mountains WSA contains 9,950 acres of public land located five miles northwest of Arco, Idaho. There are no state or private inholdings in the WSA. The area is mountainous with the highest point being 7,955 feet above sea level and 2,000 feet above the valley floor. Many well defined drainages with southward orientations feed Cherry and Antelope Creek. These drainages are intermittent in nature, carrying water only during the early spring as the winter's accumulation of snow melts. While the majority of the unit supports a sagebrush-bunchgrass complex, scattered and concentrated stands of Douglas fir occur at higher elevations. None of the Douglas fir is considered of commercial value in this WSA. Mountain mahogany is often found between the sage-to-Douglas fir transition zone or on the tops and slopes of lower hills with cooler aspects. Several pockets of aspen and willow surround moist spring areas in upper Waddoups Canyon.

Wilderness Values

Naturalness. The most apparent changes to the WSA's natural character are vehicle ways and livestock watering sites. Seven unimproved vehicle trails totaling six miles are found in the area. Six livestock

watering sites are located near springs. Trampling is evident in the area immediately surrounding each site; however, the impact on naturalness is lessened by good vegetative and topographic screening. While the WSA does essentially retain its natural character, there are human-caused imprints which visitors would encounter.

Solitude. The WSA's size and configuration combine with sufficient topographic and vegetative screening to create outstanding opportunities for solitude. Visitors to the area would be able to avoid the activities of other people and find a secluded spot in this fairly rugged area. Seven major canyons distributed throughout the WSA offer places to avoid the sights and sounds of other people.

Primitive and Unconfined Recreation. Outstanding primitive recreation opportunities in the WSA include hiking, camping, hunting, wildlife observation, and sightseeing. The steep and rugged terrain makes these activities challenging. Both day and overnight trips can be taken among the canyons, high ridges, and other points of interest. Scenic views of the surrounding mountain ranges and valley floors are excellent from the higher elevations in the WSA. Large and small mammals and numerous bird species also offer attractions to the primitive recreationist. The WSA lacks any significant feature which would be a focal or destination point for visitors.

Special Features. The WSA provides important, but not crucial, habitat for mule deer and elk.

Recreational Off Road Vehicle Use.

Recreational ORV use in the White Knob Mountains WSA is estimated to be 50 visitor days annually, and is generally associated with hunting. With seven vehicle ways into the WSA's canyons, ORV users have relatively easy access into the inner reaches of the WSA. The pattern of use is such that a hunter will drive up a way in a canyon, park at some likely-looking spot, hunt for several hours, and then return to his vehicle and drive out of the WSA the way he came in.

Energy and Mineral Resources

All mineral estates in the White Knob Mountains WSA are in federal ownership and open to mineral entry and leasing.

The WSA has been classified as having moderate favorability for oil and gas (BLM GEM, 1983). The basis of this classification is the structural setting of the WSA including excellent potential for traps, indications of subsurface structures in private geophysical data, the presence of hydrocarbon source, reservoir beds in the stratigraphic section, and the favorable thermal history of the source rocks. All of the WSA except for the southern most portion is covered by oil and gas leases granted after 1976 or by lease application.

All of the White Knob Mountains WSA is classified as being unfavorable for geothermal resources. This is based on analogy with similar areas with the Idaho Basin and Range geothermal province. Negative factors include generally high elevations and an absence of major faults or lineaments.

The WSA is classified as having low favorability for other leasable resource, including phosphate, bitumen, and asphalt. The basis of this classification is the lack of known occurrences in the area and the generally unfavorable geologic environment of the WSA.

The White Knob Mountains WSA is classified as having low to moderate favorability for metallic mineral resources (lead, zinc, silver, and copper; BLM GEM, 1983). Two groups of lode mining claims held by the Espinosa family of Burley, Idaho, involve lands within the WSA. One claim group includes two claims in the center of the west half of the east half oil Section 23, T.S.N., R. 24 E., and the other is of 10 claims in the center of Section 25, T.S.N., R. 24 E. Only one prospect has been developed by the Espinosa's so far, just inside the WSA boundary in Section 25. Assay work done in 1981 revealed silver, copper, and titanium values.

Lastly, the White Knob Mountains WSA is classified as having moderate favorability for common varieties of limestone. The dominance of carbonate rocks in the stratigraphic section provides the basis of this classification.

BURNT CREEK

General Characteristics

The Burnt Creek WSA contains 24,980 acres of public land with a 640 acre state inholding. The WSA is located at the head of the Pahsimeroi Valley, approximately 35 miles north-northwest of Arco, Idaho. The WSA is contiguous with the U. S. Forest Service RARE II Area 4-210 Borah Peak.

The WSA contains portions of four perennial streams - the Upper Pahsimeroi Creek, Burnt Creek, Short Creek, and Dry Creek. All but Short Creek support native rainbow and Dolly Varden trout populations. The WSA offers excellent scenery, from the sublime majesty of the Lost River Range to the south to the anomalies of the Rock of Ages and Squawtit. It is a mountainous area with the highest points well over 9,000 feet in elevation, 4,000 feet above the valley floor. The eastern and northern portions of the WSA are characterized by open sagebrush-grass covered hills. The southern and western portions are steeper with scattered pockets of Douglas fir and juniper.

Burnt Creek Lake lies near the headwaters of Burnt Creek. It is located in a narrow, rocky canyon surrounded by Douglas fir and mountain mahogany. Being a shallow lake, it freezes solid during the winter so no fish inhabit it. The remnants of an old dam can be seen on Dry Creek. Still found on maps, the old Dry Creek Reservoir was built in 1925 and inundated about 100 acres. In 1956, nature took its course and washed the concrete dam downstream. Today, the remains of the dam stand as a vivid reminder of nature's power against the works of man.

Wilderness Values

Naturalness. The WSA, as a whole, appears in a natural condition. The Burnt Creek and Short Creek roads are constructed improvements intruding into the WSA. Eight miles of unimproved but noticeable vehicle ways are concentrated in the eastern end of the WSA. The remains of an old dam can be seen on Dry Creek. Five developed springs and eight miles of grazing allotment fence exist in the WSA, but remain subordinate to the area's natural character.

Solitude. Outstanding opportunities for solitude exist in the WSA due to its large size, topographic relief, vegetative screening, and the remoteness of the area. Visitors would be able to avoid the sights and sounds of others in any of the WSA's many canyons. Vehicle use on the Burnt Creek and Short Creek roads would lessen the outstanding opportunities for solitude on the lands adjacent to the roads.

Primitive and Unconfined Recreation. Outstanding opportunities for primitive recreation in the WSA include hiking, backpacking, fishing, hunting, camping, wildlife observation, and sightseeing. There are no continuous barriers or man-made developments which limit recreation activities. Both day and overnight trips can be taken among the canyons, high ridges, and other points of interest. Scenic views of the Lost River Range to the south are excellent. Large and small mammals and numerous bird species also offer attractions to the primitive recreationist. Burnt Creek, Dry Creek, and Upper Pahsimeroi Creek are considered focal points for visitors to the WSA.

Special Features. The WSA contains interesting geologic features and archaeological sites. Geologic features are predominantly basalt of the Challis Volcanics. The archaeological sites are mainly implements of stone and other durable materials; most perishable goods have been lost. While such resources do add interest to the WSA, neither the geologic features nor the archaeological sites are any more significant than those found on adjacent non-WSA lands. The WSA offers quality hunting because of a wide diversity of big game species.

Recreational Off Road Vehicle Use

Recreational ORV use in the Burnt Creek WSA is estimated to be 100 visitor days annually and is generally associated with hunting. With roads up Burnt Creek and Short Creek, and with vehicle ways above the old Dry Creek Reservoir, ORV users have relatively easy access into the three major drainages of the WSA. The Ellis-Pahsimeroi MFP limits ORV use in the Burnt Creek WSA to existing roads and ways. The rugged terrain also naturally limits ORV use to existing routes, which are generally found in the canyon bottoms.

Energy and Mineral Resources

Except for the 640 acre state inholding, all mineral estates in the Burnt Creek WSA are in federal ownership and open to mineral entry and leasing.

The WSA has been classified as being moderately favorable for the accumulation of oil and gas (BLM GEM, 1983). The regional geologic environment is favorable, and both potential source and reservoir rocks occur in the subsurface of the WSA. All of the WSA except for that portion in T9N, R24E and T9N, R24 1/2E, is covered by post-1976 oil and gas leases or lease applications.

Dry Creek Valley and the northern edge of the WSA are classified as having low favorability for geothermal resources. These areas comprise the lower elevations in the WSA which might lie along major lineaments or range-boundary faults. The remainder of the WSA is classified as unfavorable for geothermal resources because the area is topographically high.

All of the Burnt Creek WSA is classified as unfavorable for other leasable commodities (BLM GEM, 1983). No rocks known to contain other leasable commodities underlie the WSA.

The Burnt Creek WSA is classified as having low favorability for metallic minerals (lead, zinc, silver, copper; BLM GEM, 1983). The area is almost entirely underlain by basaltic and andesitic Challis Volcanics; no prospects or occurrences are reported in these rocks in the region.

Similarly, the WSA has low favorability of the accumulation of saleable materials such as sand and gravel (BLM GEM, 1983). A few small areas of facial and alluvial material can be found in the WSA, but similar deposits outside the WSA are much more extensive and more accessible.

Wildlife Use

The WSA provides both year-round and seasonal habitat for elk, bighorn sheep, mule deer and antelope. Elk and bighorn sheep utilize the higher elevations adjacent to the Challis National Forest in summer and retreat to the lower valley edges of the WSA in winter. Mule deer and antelope are primarily summer and fall visitors preferring the lower valley area away from the WSA during winter. Few if any animals remain in the 8,300 acres recommended for wilderness during the winter due to deep snows and a lack of forage. The Idaho Fish and Game Department indicated that the 8,300 acres recommended suitable in the Draft EIS has high wildlife value for bighorn sheep, elk, mule deer, and antelope and provides a high quality hunting experience.

CHAPTER 4

ENVIRONMENTAL CONSEQUENCES

APPENDICITIS HILL

Proposed Action (No Wilderness Alternative)

Under the proposed action, the entire 21,900 acres of the Appendicitis Hill WSA would be recommended for nonwilderness uses. The primary impacts under this alternative relate to timber harvest and mountain mahogany thinning, and the resultant impacts on wilderness values.

Impact on Wilderness Values

The entire WSA would be recommended for nonwilderness designation and none of the wilderness values on 21,900 acres would receive the special legislative protection provided by wilderness designation. There could be short-term impacts to wilderness values associated with this action if commercial timber thinning and mountain mahogany thinning occurs in the present planning horizon (15 to 20 years).

If not in the short-term, then, wilderness values would be lost in the long-term due to timber harvest in the west side of the WSA and due to mountain mahogany thinning on the southern part of the WSA.

The Big Lost MFP identified 300 acres of commercial Douglas fir in T5N, R25E, Section 33 for commercial thinning, in which 325 MBF (thousand board feet) would be cut, representing approximately 25% of the overstory. Average dbh is over 15 inches. This would require one mile of main logging road to be constructed and one mile of existing vehicle way to be substantially improved. In addition, two miles of skid road would be constructed.

This action would result in the wilderness value of naturalness being lost on 315 acres consisting of the timber sale area and new roads. Further, the perception of naturalness would be adversely impacted on an additional 500 acres surrounding the timber activity, the area in which at least some portion of the man-caused development could be seen by a casual visitor. Impacts would include noise of the logging equipment, the new road, and the equipment itself in the short-term. Long-term impacts would include the road, and the slash and stumps that are the aftermath of timber harvest. The end result is 815 acres on which the wilderness value of naturalness would be either lost or impaired.

The wilderness value of solitude would be similarly impaired, but essentially only during the period of active timber harvest. Sights and sounds of the logging operation would reduce the feeling of solitude on 815 acres while the thinning project was occurring. After the project terminated, the impact to solitude would be negligible.

The Big Lost MFP also called for thinning a 500 acre stand of decadent mountain mahogany to stimulate new growth with the end result being an improvement in crucial winter forage for mule deer. Thinning would entail the use of powersaws. No new roads would be required and there would be no surface disturbance. Stumps would be visible as would the cut mahogany which would be left where it fell.

This action would result in minimal impacts to naturalness on 500 acres. The nature of the mahogany thinning is such that it would be essentially unnoticeable unless the viewer was amid the thinning area where the stumps and cuttings could be seen. Away from the thinned area, the activity would be substantially unnoticeable and the impacts to naturalness negligible.

The mountain mahogany thinning would impact the wilderness value of solitude only during the thinning operation. Sights and sounds of the thinning would adversely impact solitude on 700 acres; after the project was completed, there would be no impacts to the wilderness value of solitude.

The three gravel pits that are anticipated along the edge of the WSA would have a negligible impact to naturalness and solitude. Surface disturbance from the gravel pits would only total 15 acres (5 acres each) and they would be unnoticeable beyond the immediate area.

Sights and sounds from recreational ORV use would have an adverse impact on solitude. However, the impact would be minimal because ORV use is estimated to be only 50 visitor days annually and is expected to remain below 100 visitor days in the foreseeable future.

Other recreation uses would increase slightly but would remain below 150 visitor days annually for the foreseeable future. This increase would not significantly impact opportunities for solitude.

Conclusion: The wilderness values of naturalness and solitude in the Appendicitis Hill WSA would be lost or impaired on 1,515 acres for the short-term. In the long-term, the wilderness value of naturalness would be lost or impaired on 1,315 acres. Solitude would be impaired only during the actual commercial thinning or mahogany thinning.

Impacts on Recreational Off-Road Vehicle Use

The Big Lost MFP limits ORV use in the Appendicitis Hill WSA to existing roads and ways. This designation would continue once the WSA was released for nonwilderness uses. The three miles of new road associated with commercial thinning of timber southeast of Crawford Peak would only slightly increase vehicle accessibility of the WSA as a whole. Recreational ORV use is projected to remain below 100 visitor days annually for the foreseeable future.



Conclusion: There would be only a minor increase in accessibility in the WSA and ORV use is expected to remain below 100 visitor days annually for the foreseeable future. There would be no significant impacts to recreational ORV use.

Impacts on Development of Energy and Mineral Resources

All lands within the Appendicitis Hill WSA (21,900 acres) would remain open for mineral entry and leasing. All potential energy and mineral resources would be available for development. This includes a moderate favorability for discovery of oil and gas, and moderate favorability for saleable materials (sand and gravel). Development of oil and gas resources is unlikely because there is limited direct evidence that such resources do indeed exist in the WSA.

Conclusion: Potential mineral resources would be available for development. This would be a beneficial impact to the development of mineral resources in the Appendicitis Hill WSA.

Impacts on Forest Management Actions

The Big Lost MFP identified 300 acres of Douglas fir for commercial thinning and this could occur under the proposed action. Approximately 325 MBF would be cut (about 25% of the total overstory in the stand). Other stands could be logged under the proposed action although it is unlikely to happen for at least the next twenty years if the current balance between supply, demand, and cost structure remains consistent. Other timber management practices such as tree planting could occur.

Conclusion: Commercial thinning on 300 acres could occur as anticipated, resulting in 325 MBF of timber cut. Other intensive forest management practices could occur although harvests on other stands is unlikely. This would be a beneficial impact to forest resources in the Appendicitis Hill WSA.

Impacts on Mule Deer Winter Range

The Big Lost MFP calls for improving mule deer crucial winter range by thinning 500 acres of decadent mountain mahogany. This could occur under the Proposed Action. Thinning would be done using chainsaws and cuttings would be left where they fell; from 1/3 to 1/2 of the mature shrubs would be removed.

Thinning mahogany would encourage new sprouting from the stumps and limb ends of the shrubs. By providing new growth, the quality and quantity of crucial winter forage for mule deer on this 500 acre stand would be improved. Because cuttings would be left where they fell, these would protect new seedlings from deer browsing until the seedlings were well established and large enough to recuperate from browsing. Cuttings would also provide immediate (first year) forage. The end result would be an overall improvement in the quality of 500 acres of crucial winter range for mule deer in the WSA, and an increase of 30 percent in the mule deer population.

Conclusion: Thinning of decadent mountain mahogany could occur, resulting in the improvement in the quality of 500 acres of crucial winter range for mule deer and a 30 percent increase in population in the Appendicitis Hill WSA. Deer utilizing this range would have a better chance of surviving a harsh winter. This would be a beneficial impact to the wintering mule deer population in the WSA.

Partial Wilderness Alternative

Under the Partial Wilderness Alternative, 13,670 acres would be recommended for wilderness and 8,230 acres would be recommended for nonwilderness uses (Map 4). The primary impacts of this action relate to wilderness designation, foregone timber harvest opportunities, and foregone opportunities to improve mule deer winter range.

Impacts on Wilderness Values

Wilderness values on 13,670 acres of the WSA would be protected by legislative mandate, while 8,230 acres would not receive the special legislative protection provided by wilderness designation. No timber harvest would be allowed in the designated wilderness portion of the WSA. Because all of the commercial timber lies within the area recommended for wilderness under this alternative, the wilderness values of naturalness and solitude would benefit.

An estimated 15 visitor days annually of recreational ORV use would be eliminated from the wilderness portion of the WSA. Although encounters between ORV users and other recreationists are infrequent at current levels of use, the elimination of ORV use would benefit the wilderness value of solitude because visitors would not encounter or hear ORV users in the area. Beneficial impacts to naturalness due to elimination of ORV use would be negligible because current use levels are quite low.

All 500 acres of mountain mahogany identified for thinning lies within the designated wilderness portion of the WSA under this alternative. Because of this, no improvement of crucial winter range for mule deer would be done. This would benefit the wilderness values of naturalness and solitude because of the elimination of the activity of thinning and because the stand would be left in its natural state.

Wilderness designation would result in the withdrawal of 13,670 acres from all forms of mineral entry and leasing. While mineral development in this WSA is unlikely, this action would forego any future mineral resource development. The wilderness values of naturalness and solitude would thus benefit over the long term.

Under this alternative, the 8,230 acres of the WSA recommended for nonwilderness uses would remain open for mineral entry and leasing. No development is anticipated, however, so wilderness values would not be impacted in the short-term. Three gravel pits along the eastern edge of the WSA would impair naturalness and solitude only negligibly because surface disturbance would be minimal (total of 15 acres) and they would be unnoticeable beyond the immediate area.

Sights and sounds from recreational ORV use in the nondesignated portion of the WSA would have an adverse impact on solitude. The impact would be minimal because ORV use is estimated to be less than 35 visitor days annually. Recreational ORV use is expected to remain below 100 visitor days annually for the foreseeable future so the long-term impact of ORV use on the wilderness value of solitude would be negligible.

Conclusion: Wilderness values of naturalness and solitude would be protected on 13,670 acres of the Appendicitis Hill WSA. Impacts to naturalness and solitude would not occur on 1,315 acres. Wilderness values on 8,230 acres of the WSA would not be protected but no development or impairing use is anticipated on this portion of the WSA. Thus, impacts to wilderness values on 8,230 acres of nonwilderness would be minimal in the short-term.

Impacts on Recreational Off-Road Vehicle Use

The Big Lost MFP limits ORV use in the Appendicitis Hill WSA to existing roads and ways. This designation would continue on 8,230 acres of land recommended for nonwilderness uses under this alternative. No new roads are anticipated. Recreational ORV use in the 8,230 acre nonwilderness portion of the WSA is projected to remain below 100 visitor days annually for the foreseeable future.

An estimated 15 visitor days annually of recreational ORV use would be eliminated from the 13,670 acres designated as wilderness under this alternative. Future opportunities would be foregone. However, there are similar or superior opportunities for ORV use on public land throughout the region. Any ORV use displaced from this portion of the WSA upon designation would be absorbed on the surrounding public land.

Conclusion: Recreational ORV use would continue at a level below 35 visitor days annually on 8,230 acres of land recommended for nonwilderness uses. ORV use of 15 visitor days annually would be eliminated from the 13,670 acres recommended for wilderness. The impact of this action on recreational ORV use in the Appendicitis Hill WSA would be minimal because of similar or superior opportunities for ORV use on surrounding public land.

Impacts on Development of Energy and Mineral Resources

The 8,230 acres of the WSA recommended for nonwilderness uses would remain open to mineral entry and leasing. All potential mineral resources in this portion of the WSA would be available for development. Other than the three gravel pits along the eastern edge of the WSA, no further mineral developments are planned and none are anticipated in the foreseeable future.

The remaining 13,670 acres recommended for wilderness designation would be withdrawn from all forms of mineral entry and leasing. This includes a moderate favorability for discovery of oil and gas. There are

no plans to develop any mineral resource within the 13,670 acre area recommended for wilderness, nor are there any projections to do so in the foreseeable future, with or without wilderness designation.

Conclusion: Potential mineral resources would be available for development on 8,230 acres of the Appendicitis Hill WSA. Opportunities to develop mineral resources on 13,670 acres of the WSA would be foregone. The impact of this action on development of mineral resources would be minimal because future projections do not indicate the likelihood of mineral development in this portion of the WSA.

Impacts on Forest Management Actions

No timber harvest would be allowed in the 13,670 acres recommended for wilderness under this alternative. All of the commercial timber in the WSA lies within the portion recommended for wilderness, so forest management practices would be minimal. Commercial thinning of 300 acres, as called for in the Big Lost MFP, would not occur.

Conclusion: The opportunity to commercially thin 300 acres of Douglas fir would be foregone. Future timber harvest on the remaining stands of commercial timber would also be foregone but the impact would be minimal because the current balance between supply, demand, and cost structure makes it unlikely that any further timber harvest would occur in the foreseeable future.

Impacts on Mule Deer Winter Range

Under this alternative, no mountain mahogany thinning would occur because the 500 acre stand identified in the Big Lost MFP lies within the 13,670 acres recommended for wilderness. Other vegetative manipulations are either expressly not allowed in wilderness or they are not feasible. For example, prescribed fire is allowable in wilderness, but it is not a feasible treatment method for mountain mahogany. Mahogany is an extremely fire sensitive species. Due to the intensity of a mountain mahogany fire, plants are killed and seed sources destroyed. Studies in similar areas show that it may take up to 17 years for a burned stand of mahogany to begin rejuvenation. Other activities such as chaining, hand cutting, and spraying are not allowable in designated wilderness.

Without any improvement in the crucial winter range for mule deer in the WSA, deer populations would continue to utilize the existing habitat. Mountain mahogany would continue to be the preferred forage until it was depleted, then the deer would switch to sagebrush as the primary forage. Sagebrush is lower in quality than mahogany as a forage plant, and does not provide the nutrients available from mahogany. Mule deer would probably not suffer any adverse impacts in the short-term. Over the long-term, there would be loss of habitat and a downward trend in the mule deer population by as much as 30%.

Conclusion: Crucial winter habitat for mule deer would not be improved because the 500 acre mountain mahogany thinning would not be allowed. There would be no impacts to the mule deer population in the short-term, but there would be a long-term reduction of the population by as much as 30%.

All Wilderness Alternative

Under the All Wilderness Alternative, the entire 21,900 acre Appendicitis Hill WSA would be recommended for wilderness designation (Map 4). The primary impacts of this action relate to wilderness designation and the resultant foregone timber harvest, along with the inability to improve crucial winter range for mule deer.

Impacts on Wilderness Values

Wilderness values on the entire 21,900 acre Appendicitis Hill would receive the special legislative protection provided by wilderness designation. No timber harvest or mountain mahogany thinning would occur, resulting in a beneficial impact to wilderness values of naturalness and solitude on 1,315 acres. The entire area would be withdrawn from all forms of mineral entry and leasing, so again, wilderness values would benefit.

An estimated 50 visitor days annually of ORV use would be eliminated by wilderness designation. Although encounters between ORV users and other recreationists are infrequent at current levels of use, the elimination of ORVs would benefit the wilderness value of solitude because visitors would not encounter or hear ORV users in the area. Beneficial impacts to naturalness would be negligible because current use levels are low.

Conclusion: Wilderness values of naturalness and solitude would be protected on the entire 21,900 acres of the Appendicitis Hill WSA. Adverse impacts to naturalness and solitude would not occur on 1,315 acres. This would be beneficial to wilderness values.

Impacts on Recreational Off-Road Vehicle Use

An estimated 50 visitor days annually of ORV use would be eliminated from the entire 21,900 acres of the WSA. Future opportunities for ORV oriented recreation would be foregone. However, there are similar or superior opportunities for ORV use on public land throughout the region. Any ORV use displaced from the WSA upon wilderness designation would be absorbed with no consequence on surrounding public land.

Conclusion: Recreational ORV use of 50 visitor days annually would be foregone; the impacts of displacing this use to other nonwilderness public land would be negligible.

Impacts on Development of Energy and Mineral Resources

Wilderness designation would withdraw all 21,900 acres of the Appendicitis Hill WSA from mineral entry or leasing, subject to valid existing rights at the time of designation. The opportunity to explore for and develop mineral resources, including a moderate favorability for oil and gas, would be foregone. Other than the three gravel pits anticipated along the eastern edge of the WSA, there are no plans to develop any mineral resource within the WSA, nor are there any projections to do so in the foreseeable future.

Conclusion: The entire 21,900 acres of the Appendicitis Hill WSA would be withdrawn from mineral entry and leasing. This would not be a significant impact because there are no plans for development, nor are there any projections for development in the future.

Impacts on Forest Management Actions

By designating the entire WSA as wilderness, timber harvest opportunities on 870 acres of commercial timber would be foregone. Forest management practices on all forested land in the WSA (2,100 acres) would be minimal. The current balance between supply, demand, and cost structure is such that it is highly unlikely that any timber harvest would occur in the foreseeable future, except for the planned commercial thinning of 300 acres of commercial timber. Commercial thinning would result in 325 MBF of timber cut, so wilderness designation would preclude the harvest of 325 MBF of timber.

Conclusion: Wilderness designation of the entire Appendicitis Hill WSA would result in the loss of 325 MBF of timber harvested and would preclude future timber sales on 870 acres of commercial timber. This impact is minimal, however, because current market trends make it unlikely that there would be any timber harvests in the foreseeable future.

Impacts on Mule Deer Winter Range

Wilderness designation for the entire WSA would preclude thinning mountain mahogany to improve crucial winter range for mule deer on 500 acres. As stated in the Partial Wilderness Alternative, thinning mahogany is the only feasible method to stimulate new growth and increase available forage.

Without any improvement in the crucial winter range for mule deer in the WSA, deer would continue to use existing habitat. Mountain mahogany would continue as the preferred forage until it was depleted, then the deer would switch to sagebrush. Sagebrush is lower in quality than is mahogany as a forage plant and does not provide the nutrients available from mahogany. Mule deer would probably not suffer any adverse impacts in the short-term. Over the long-term, there would be a gradual loss of habitat and a downward trend in the mule deer population by as much as 30%.

Conclusion: Crucial winter habitat for mule deer would not be improved on 500 acres because the mountain mahogany thinning would not be allowed. There would be no impacts to the mule deer population in the short-term, but there would be a long-term reduction of the population by as much as 30%.

WHITE KNOB MOUNTAINS

Proposed Action (No Wilderness Alternative)

Under the proposed action, the entire 9,950 acres of the White Knob Mountains WSA would be recommended for nonwilderness uses. The primary impacts under this alternative relate to the development of mineral resources and the resultant impacts on wilderness values in the long-term.

Impacts on Wilderness Values

The entire WSA would be recommended for nonwilderness uses and none of the wilderness values on the 9,950 acres of the WSA would receive the special legislative protection provided by wilderness designation. The short-term impact of this action would be negligible because little development activity is anticipated in the short-term whether or not the area is designated wilderness.

In the long-term, however, wilderness values would be lost as a result of mineral development along the WSA's eastern boundary in Waddoups Canyon, oil and gas development near the head of Schoolhouse Canyon, and gravel extraction on the WSA's southwestern boundary.

It is assumed that three existing lode claims along the WSA's eastern boundary in Waddoups Canyon would be explored. This would require construction of one mile of new road; the claims are close to an existing road so the requirements for additional road is small. Development activities on each claim would include 20 acres of surface disturbance associated with tailing piles, adits, loading areas, and buildings. The three claims, then, would have a total of 60 acres of surface disturbance and a total of one mile of new road.

One oil and gas well is anticipated to be drilled near the head of Schoolhouse Canyon. Access for this well would be from the Waddoups Canyon Road over the ridge to the west side of Schoolhouse Canyon. This would require two miles of new road to get into Schoolhouse Canyon; there would be 10 acres of surface disturbance at the well site associated with the drill pad and equipment parking areas.

The single gravel pit along the WSA's southwestern border requires no new road, but would entail five acres of surface disturbance.

While somewhat isolated from one another, the three aforementioned activities would combine to reduce the naturalness of the area. The development of the three lode claims in Waddoups Canyon would impact the perception of naturalness on approximately 240 acres immediately surrounding the claims due to the visibility of the estimated surface disturbance of the claims. The gravel pit would impact naturalness on only twenty acres because of its small size and limited activity. Conversely, the oil and gas well would negatively affect naturalness on 720 acres. During the exploratory phase, the noise of the machinery, the lights, the new road, and the machinery itself would combine to reduce naturalness in an area much larger than the actual surface disturbance.

During the well's production phase, impacts to naturalness would be lessened, but it would still impact the perception of naturalness on 320 acres. This includes the impacts of the access road, the well, and the collection and storage facility.

Opportunities for solitude would also be negatively impacted by mineral development. Sights and sounds from traffic, construction, and production would reduce the quality of solitude to the same degree as naturalness. Outstanding opportunities for solitude would be lost on a total of 980 acres from all energy and mineral activities.

Sights and sounds from recreational ORV use would also have an adverse impact on solitude. However, this impact would be minimal because ORV use is estimated to be only 50 visitor days annually and is expected to remain below 100 visitor days annually for the foreseeable future.

Other recreation uses would increase slightly but would remain below 150 visitor days annually for the foreseeable future. This increase would not significantly impact opportunities for solitude.

Conclusion: The White Knob Mountains WSA's wilderness values of naturalness and outstanding opportunities for solitude would be lost or impaired on 980 acres, or 10% of the WSA. Naturalness and solitude on 8,970 acres would be subject to loss in the long-term, but no impairing activities are anticipated in the foreseeable future.

Impacts on Recreational Off-Road Vehicle Use

The WSA would be open to ORV use. The two miles of new road associated with oil and gas development in Schoolhouse Canyon would make the north-central portion of the WSA more accessible to ORV users. However, recreational ORV use is projected to remain below 100 visitor days annually for the foreseeable future.

Conclusion: While some of the WSA would be more accessible, recreational ORV use would remain below 100 visitor days annually. There would be no significant impact on recreational ORV use.

Impacts on Development of Energy and Mineral Resources

All lands within the White Knob Mountains WSA would remain open for mineral entry and leasing. All potential mineral resources would be available for development. This includes a moderate favorability for the discovery of oil and gas, low to moderate favorability for metallic minerals, and moderate favorability for saleable minerals (sand and gravel).

Conclusion: Potential mineral resources would be available for development. This would be a beneficial impact to the development of mineral resources in the White Knob Mountains WSA.

All Wilderness Alternative

Under the All Wilderness Alternative, all 9,950 acres of public land in the White Knob Mountains WSA would be recommended for wilderness. The primary impacts of this alternative relate to the mineral withdrawal and ORV closure in designated wilderness.

Impacts on Wilderness Values

The entire WSA would be recommended for wilderness so wilderness values on the 9,950 acres of the WSA would be protected by legislative mandate. Mining claims in the WSA with valid existing rights could be fully developed if a validity examination showed that the claims held sufficient quantity and quality of material so that a prudent man could expect a reasonable return on his investment. For the existing claims in the WSA, it is assumed for purposes of analysis that the claims would not satisfy a validity examination and thus, could not be developed. Wilderness designation would also withdraw the WSA from any future mineral entry and possible development. Wilderness values of naturalness and solitude would be retained in the WSA.

An estimated 50 visitor days annually of ORV use would be foregone under the All Wilderness Alternative. This would enhance naturalness and opportunities for solitude within the WSA.

Conclusion: Wilderness values would be retained on all 9,950 acres of the White Knob Mountains WSA. Negative impacts on 980 acres would not occur.

Impacts on Recreational Off-Road Vehicle Use

Wilderness designation would close the entire 9,950 acre White Knob Mountains WSA to all forms of recreational ORV use. The present level of 50 visitor days annually of ORV use in the WSA would be eliminated. However, there are similar or superior opportunities for ORV use on public land throughout the region. Any ORV use displaced from the WSA upon wilderness designation would be absorbed on the surrounding public land.

Conclusion: Recreational ORV use of 50 visitor days annually would be foregone. The impacts of displacing this use to other nonwilderness public land would be negligible.

Impacts on Development of Energy and Mineral Resources

Wilderness designation would withdraw all 9,950 acres of public land within the WSA from all forms of mineral entry and leasing, subject to valid rights at the time of designation. There would be no oil and gas development activities.

Prior to commencing work on the existing claims in the WSA, a validity examination must show that the claims hold sufficient quantity and quality of material so that a prudent man could expect a reasonable return on his investment. For purposes of analysis, it is assumed that the

existing claims within the WSA would not pass a validity examination and thus, could not be developed. Other, as yet undiscovered energy and mineral resources could not be developed.

There would also be no further sales of sand and gravel from within the WSA. This would be a negligible impact, however, because ample supplies exist outside the WSA.

Conclusion: Opportunities to explore for and develop potential metallic mineral deposits and sand and gravel would be foregone. There would be no oil and gas development activities.

BURNT CREEK

Proposed Action (No Wilderness Alternative)

Under the proposed action, the entire 24,980 acres of the Burnt Creek WSA would be recommended for nonwilderness uses. The principal impacts under this alternative relate to the development of oil and gas resources and the resultant impacts on wilderness values in the long-term.

Impacts on Wilderness Values

The entire WSA would be recommended for nonwilderness uses and none of the wilderness values on the 24,980 acres of the WSA would receive the special legislative protection provided by wilderness designation. The short-term impact of this action would be negligible because little development activity is anticipated in the short-term whether or not the area is designated wilderness.

In the long-term, wilderness values would be lost as a result of oil and gas development in the Short Creek drainage. It is anticipated that one well would be drilled in this drainage. Access to the well would be up the existing Short Creek Road to its end, then continue up the west side approximately one mile to the well site. There would be 10 acres of surface disturbance at the well site associated with the drill pad and equipment parking areas. Such a development would negatively affect the perception of naturalness on 975 acres, the estimated area in which at least some portion of the man-made development could be seen by the casual visitor. Impacts include the noise of the machinery, lights, new road, and the machinery itself; these would be obvious intrusions into an otherwise natural appearing landscape.

Opportunities for solitude would also be lost because of oil and gas development. Sights and sounds of traffic, construction, and production would decrease one's chances of finding solitude to the same degree as naturalness. Outstanding opportunities for solitude would thus be lost on 975 acres in the Short Creek drainage.

Sights and sounds from recreational ORV use would also have an adverse impact on solitude but the impact would be minimal because ORV use levels are low. Presently, ORV use is estimated to be 100 visitor days annually and is expected to remain below 200 visitor days annually for the foreseeable future.

Other recreation uses would increase slightly but would remain at levels below 200 visitor days annually for the foreseeable future. This increase would not significantly affect opportunities for solitude.

Conclusion: The Burnt Creek WSA's wilderness values of naturalness and outstanding opportunities for solitude would be lost on 975 acres. Naturalness and solitude on 24,005 acres would be subject to loss in the long-term but no adverse activities are presently anticipated.

Impacts on Recreational Off-Road Vehicle Use

The Ellis-Pahsimeroi MFP limits ORV use in the Burnt Creek WSA to existing roads and ways. This designation would continue to be in affect once the WSA was released for nonwilderness uses. The mile of new road associated with the Short Creek oil and gas well would add little to the vehicle accessibility of the WSA as a whole. Recreational ORV use is projected to remain below 200 visitor days annually for the foreseeable future.

Conclusion: There would be only a minor increase in accessibility in the WSA and ORV use is expected to remain below 200 visitor days annually for the foreseeable future. There would be no significant impact to recreational ORV use.

Impacts on Development of Energy and Mineral Resources

All lands within the Burnt Creek WSA would remain open for mineral entry and leasing. All potential mineral resources would be available for development. This includes a moderate favorability for discovery of oil and gas.

Conclusion: Potential mineral resources would be available for development. This would be a beneficial impact to the development of mineral resources in the Burnt Creek WSA.

Partial Wilderness Alternative

Under the Partial Wilderness Alternative, 8,300 acres of the Burnt Creek WSA would be recommended for wilderness while 16,680 acres would be recommended for nonwilderness uses (See Map 6).. The primary impacts under this alternative relate to the development of oil and gas resources and the resultant impacts on wilderness values in the long-term.

Impacts on Wilderness Values

None of the wilderness values on 16,680 acres would receive special legislative protection provided by wilderness designation. The short term impact of this action would be negligible because little development activity is anticipated in the next five years.

In the long-term, wilderness values on 16,680 acres are expected to suffer adverse impacts or be lost due to oil and gas exploration and development. One oil and gas well is expected to be drilled in the Short Creek drainage, outside but adjacent to the area recommended for wilderness under this alternative. The well would entail 10 acres of surface disturbance and one mile of new road. As a result, the wilderness value of naturalness would be lost on 975 acres, including 225 acres inside the area recommended for wilderness.

In addition to naturalness, activities associated with oil and gas development would adversely impact the wilderness value of outstanding opportunities for solitude. Sights and sounds from traffic, construction, and production at the wellsite would lower the quality of solitude on 975 acres, again including 225 acres inside the area recommended for wilderness.

Sights and sounds from recreational ORV use in the nondesignated area would also have an adverse impact on solitude, but the impact would be minimal because ORV use is estimated to be less than 65 visitor days annually. Recreational ORV use is expected to remain below 150 visitor days annually for the foreseeable future, so the long-term impact of ORV use on the wilderness value of solitude would be negligible.

Wilderness values on 8,300 acres would be protected by legislative mandate. Wilderness designation would withdraw these lands from mineral entry and leasing and would eliminate the potential for future mineral development on 8,300 acres. Wilderness values of naturalness and solitude would benefit from this action.

An estimated 35 visitor days annually of recreational ORV use would be eliminated from the wilderness portion of the WSA. Although encounters between ORV users and other recreationists are infrequent at current levels of use, the elimination of ORV use would benefit the wilderness value of solitude because visitors would not encounter or hear ORV users in the area. Beneficial effects to naturalness due to elimination of ORV use would be negligible because current use levels are quite low.

Conclusion: Wilderness values of naturalness and solitude would be adversely affected on four percent (975 acres) and retained on 33% (8,300 acres) of the WSA. Wilderness values on 63% (15,705 acres) of the WSA would be subject to loss in the long-term but no adverse activities are presently anticipated.

Impacts on Recreational Off-Road Vehicle Use

The Ellis-Pahsimeroi MFP limits ORV use in the Burnt Creek WSA to existing roads and ways. This designation would continue in the 16,680 acres of nonwilderness in the WSA. The mile of new road associated with the anticipated oil and gas well in the Short Creek drainage would add little to the accessibility of the WSA. Recreational ORV use in the 16,680-acre nonwilderness portion of the WSA is projected to remain below 150 visitor days annually in the foreseeable future.

An estimated 35 visitor days annually of recreational ORV use would be eliminated from the 8,300-acre designated wilderness portion of the WSA. Future opportunities for ORV-oriented recreation in this portion of the WSA would be foregone. However, there are similar or superior opportunities for ORV use on public land throughout the region. Any ORV use displaced from this portion of the WSA upon designation would be absorbed on the surrounding public land.

Conclusion: Recreational ORV use would continue at a level below 65 visitor days annually on 16,680 acres of nonwilderness; 35 visitor days annually of ORV use would be eliminated from the 8,300 acre wilderness portion of the WSA. Future opportunities for recreational ORV use on 8,300 acres would be foregone.

Impacts on Development of Energy and Mineral Resources

The 16,680 acres of the WSA recommended for nonwilderness uses would remain open to mineral entry and leasing. All potential mineral resources in this portion of the WSA would be available for development. It is anticipated that one oil and gas well would be drilled in the Short Creek drainage.

The 8,300 acres of the WSA recommended for wilderness would be withdrawn from all forms of mineral entry and leasing. However, there are no plans to develop any mineral resource within the 8,300-acre area recommended for wilderness, nor are there any projections favorable for such developments.

Conclusion: Potential mineral resources would be available for development on 16,680 acres of the Burnt Creek WSA. Opportunities to develop mineral resources on 8,300 acres would be foregone. This impact would be minimal because future projections do not indicate the likelihood of mineral development in this portion of the WSA.

All Wilderness Alternative

Under the All Wilderness Alternative, the entire 24,980 acres of the Burnt Creek WSA would be recommended for wilderness. The primary impacts of this alternative relate to the mineral withdrawal and ORV closure in designated wilderness.

Impacts on Wilderness Values

Wilderness values on the entire WSA (24,980 acres) would receive the special legislative protection provided by wilderness designation. Wilderness values of naturalness and solitude would benefit from this action because 975 acres of the WSA would not be impacted by oil and gas development activities.

An estimated 100 visitor days annually of recreational ORV use would be eliminated from the WSA by wilderness designation. Although encounters between ORV users are infrequent with current levels of use, the elimination of ORV use would benefit the wilderness value of solitude because visitors would not encounter or hear ORV users in the area. Beneficial effects to naturalness due to elimination of ORV use would be negligible because the present level of use is low.

Conclusion: Wilderness values would be maintained on all 24,980 acres of the WSA. Because development of potential oil and gas resources would be foregone, adverse impacts to naturalness and solitude would not occur on 975 acres that would otherwise be disturbed.

Impacts on Development of Energy and Mineral Resources

Wilderness designation would withdraw all 24,980 acres of the Burnt Creek WSA from mineral entry and leasing, subject to valid existing rights at the time of designation. No mining claims currently exist in the WSA. The opportunity to explore for and develop mineral resources, including oil and gas, would be foregone.

Conclusion: Opportunities to explore for and develop potential energy and mineral resources would be foregone on 24,980 acres.

Impacts on Recreational Off-Road Vehicle Use

Wilderness designation would close the entire 24,980-acre Burnt Creek WSA to all forms of recreational ORV use. An estimated 100 visitor days annually of ORV use in the WSA would be eliminated. However, there are similar or superior opportunities for ORV use on public land throughout the region. Any ORV use displaced from the WSA upon wilderness designation would be absorbed on the surrounding public land.

Conclusion: Recreational ORV use of 100 visitor days annually would be foregone; the impacts of displacing this use to other nonwilderness public land would be negligible.

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

If a WSA is not designated wilderness, all present, short-term uses would continue. Off-road vehicle use, timber harvest, mining, and mineral leasing activities could reduce the wilderness values over the long-term.

If an area is designated wilderness, it would ensure the long-term productivity of ecosystems and would maintain or enhance present wilderness values. Motorized vehicles could no longer be used except where prescribed by an area's wilderness management plan. Mineral resources would not be available for location and development after December 31, 1983.

IRREVERSIBLE AND IRRETRIEVABLE COMMITMENT OF RESOURCES

Activities such as mining, mineral leasing, and material sales, could create an irreversible commitment of the wilderness resource in part or all of a WSA, if not designated as wilderness. Wilderness designation would not create an irretrievable or irreversible commitment of resources within a WSA. Designation would restrict or stop development activities and maintain an area's natural condition. If, in the future, Congress decides it would be in the national interest to develop certain resources within a wilderness, they can modify the law to allow it.

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.

REVIEWERS AND RESPONSES

The following list identifies agencies, organizations, and individuals to whom copies of the draft EIS were sent. Those agencies, organizations, and individuals who returned written comments are denoted by a letter and page number. The comments for which responses were prepared are identified by vertical lines and consecutive numbers in the left margins of each letter. The corresponding responses are shown on the left facing page by each letter and are numbered to match the comments.

Elected Officials

Letter

Page

Federal

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

State

Governor John Evans
Representative Ray Infanger
Representative Wayne Tibbets
Senator Vearl Crystal

Local

Mayor, Arco
Mayor, Challis
Butte County Commissioners
Butte County Planning Commission
Custer County Commissioners
Custer County Planning Commission

Advisory Councils

Idaho Falls District Advisory Council
Idaho Falls District Grazing Advisory Board
Salmon District Advisory Council
Salmon District Grazing Advisory Board

Federal Agencies

Department of Interior

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

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Department of Agriculture

Soil Conservation Service
Forest Service

Federal Aviation Administration 17 111

Department of Transportation

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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

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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

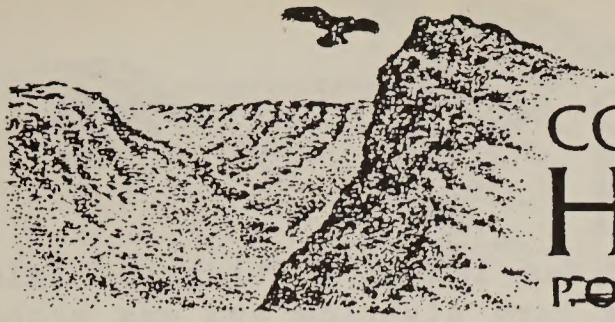
Dear Sir:

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 CIIFD'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 USA. The White Knob Mountains USA 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

~~P.O. 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.

-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.

-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.

-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).



1-5 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.

1-6 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

(A) "Quality of the natural characteristics is low due to numerous unimproved vehicle ways and livestock watering sites."

1-7 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 a fence is. /

- 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).



COMMITTEE FOR IDAHO'S ^{East} HIGH DESERT ^{Idaho} ^{Chapter}

~~P.O. BOX 463 BOISE IDAHO 83701~~

1-8 (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?

1-9 (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.

1-10 (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.

1-11 (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..."

1-12

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."

1-13

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

MAP 4

LAND STATUS

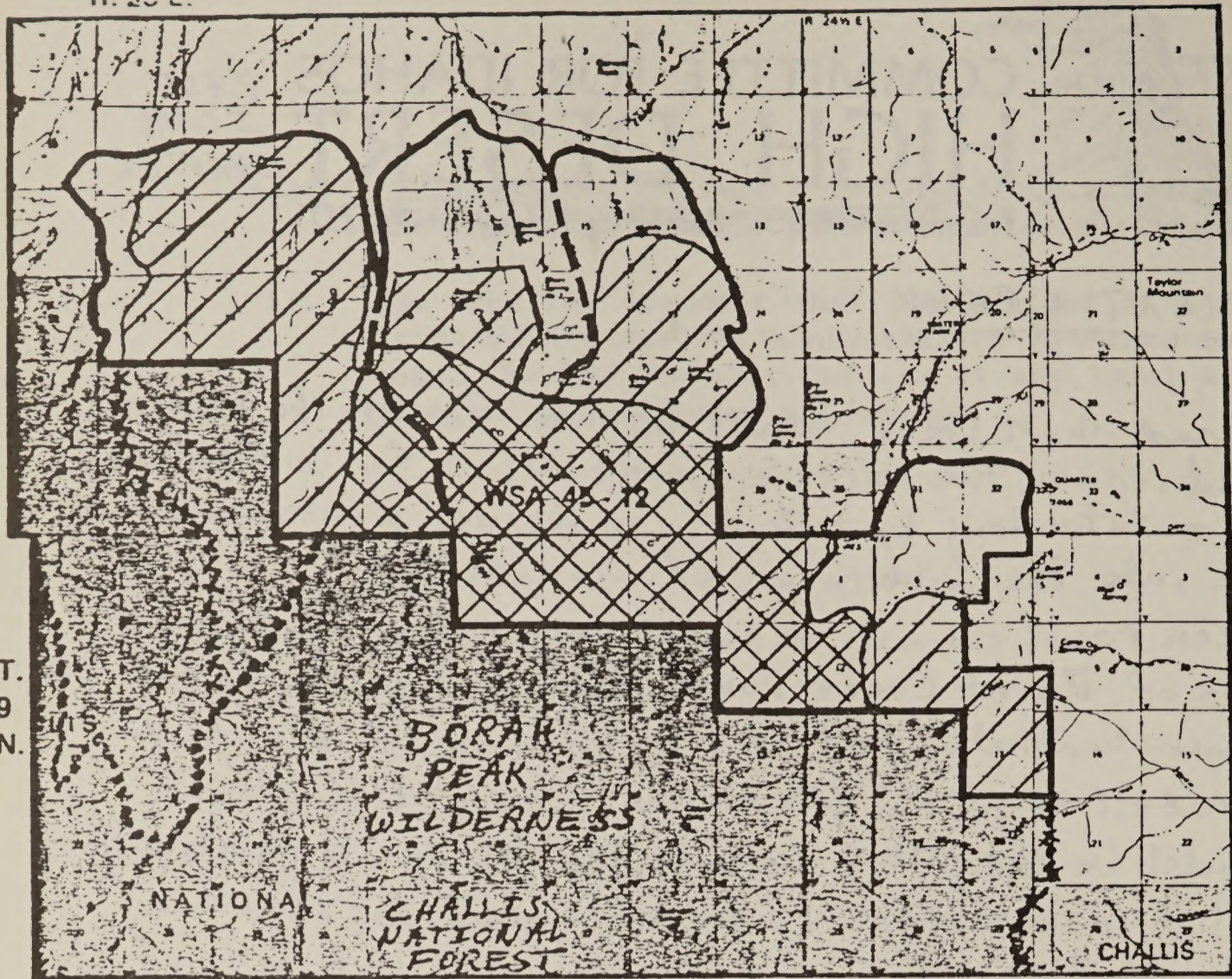
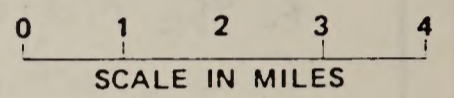
- PUBLIC LAND
- STATE LAND
- U.S. FOREST SERVICE LAND
- DEAD END ROADS
- WILDERNESS STUDY AREA BOUNDARY
- ALL WILDERNESS ALTERNATIVE
- NO WILDERNESS ALTERNATIVE

Forest Service-proposed wilderness boundary

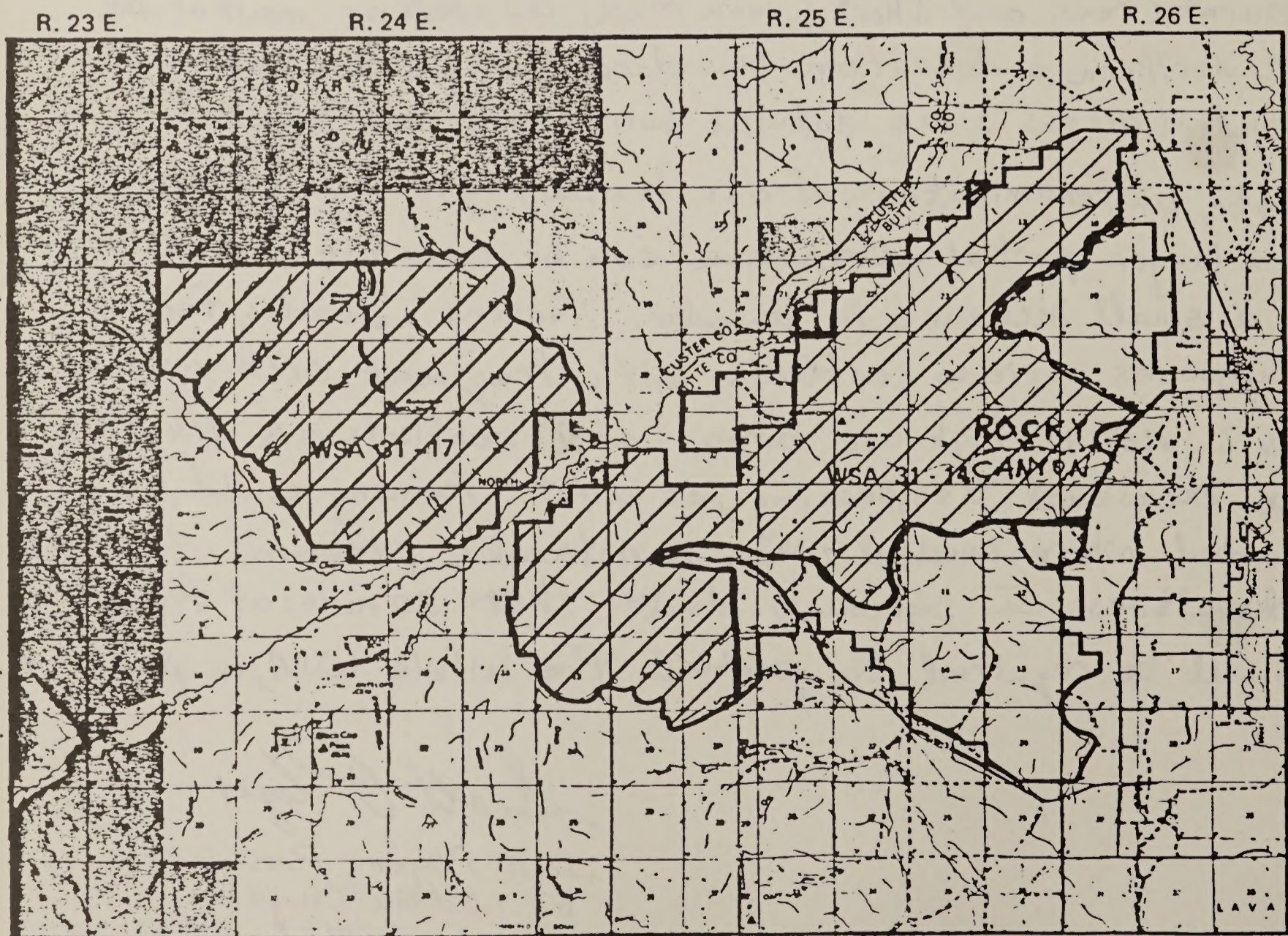
conservationists' Borah Peak boundary

BLM-recommended wilderness

CIHD-proposed wilderness



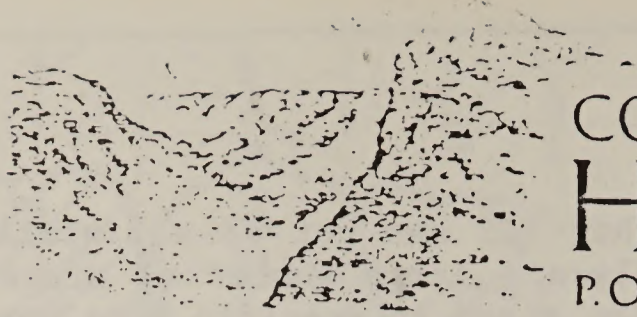
BURNT CREEK WSA 45 - 12



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.

2-1 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-Küchler 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 -administratively 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 analogous 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).

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 1983

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.

3-5 - Quality of natural characteristics is low due to numerous improved vehicle ways and livestock watering sites.

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.

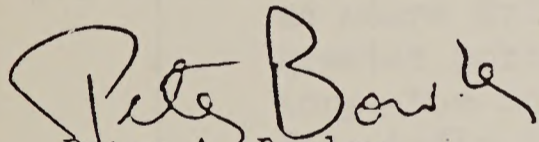
Our culture in America is famous for its Wilderness Areas and its National

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,

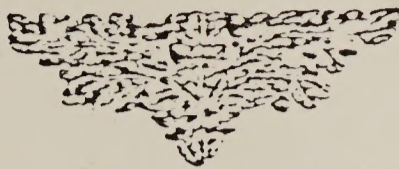


Peter A. Bowler
Star Route
Bliss, Idaho
83314

- 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

1308 N. 20th St.
Boise, Idaho 83702
October 26, 1985

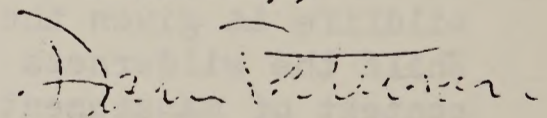
Mr. Kenneth Walker
District Manager
Salmon District BLM
P.O. Box 430
Salmon, Idaho 83467

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:

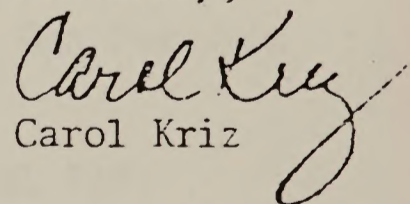
I would like to offer the following comments on the draft Big Lost/
Pahsimeroi Grazing EIS. Please incorporate these comments in the final
EIS.

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 main-
tain 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 avail-
able 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

7-1: See Response 2-1.

[Handwritten signature]
Date: _____

819 South Roosevelt
Boise, ID 83705
25 October 1983

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

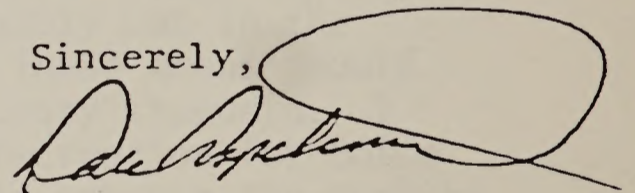
Dear Mr. Walker,

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.

The Board of Directors of the Corporation is pleased to announce that it has approved the proposed amendments to the Charter of the Corporation. The amendments are designed to clarify the powers and duties of the Board and to provide for the more efficient operation of the Corporation. The amendments are being submitted to the stockholders for their approval.

It is stated that the amendments are designed to clarify the powers and duties of the Board and to provide for the more efficient operation of the Corporation. The amendments are being submitted to the stockholders for their approval. The Board of Directors is confident that the stockholders will find the amendments to be in their best interests and will approve them.

The Board of Directors is confident that the stockholders will find the amendments to be in their best interests and will approve them. The amendments are being submitted to the stockholders for their approval. The Board of Directors is confident that the stockholders will find the amendments to be in their best interests and will approve them.

[Handwritten signature]
1988
1000 Main St.
New York, N.Y.

See Official Records, Vol. 1, Page 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 (M3110-49, 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 BLM 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 Jayne
 1568 Lola St.
 Idaho Falls, Id.
 83402

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

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

SALMON
DISTRICT OFFICE
SALMON, IDAHO

^{Oct 12 15 10 PM '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.

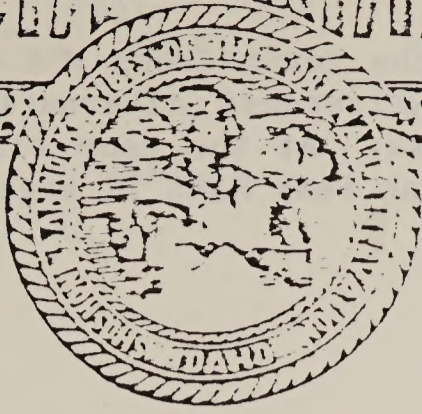
Today, I have two small daughters of my own and it is my desire that they enjoy the land within WSA 45-12 now and not when they become adults and are physically able to endure the hardships that backpacking requires. If you close most or all of the existing roads in this area, however, it will be years, 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.

[Faint, illegible handwriting, likely bleed-through from the reverse side of the page.]

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

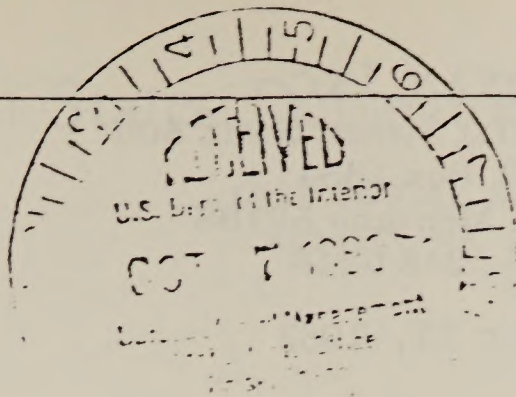
Dan M. Christopherson
Tribal Fish and Wildlife Biologist

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

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:

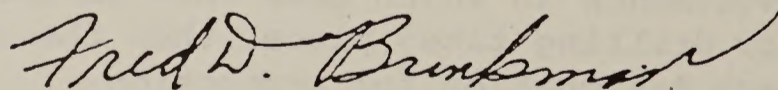
Ronan Inc., an oil and gas company located in Billings, Montana, concurs with the Bureau of Land Management's Salmon District Office draft document recommending the captioned Wilderness Study Areas (WSA's) as nonsuitable for inclusion in the National Wilderness Preservation System.

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

OCT 5 1983

In Reply Refer To:
EGS-Mail Stop 423

Memorandum

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

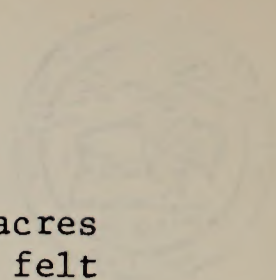
From: Assistant Director for Engineering Geology

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

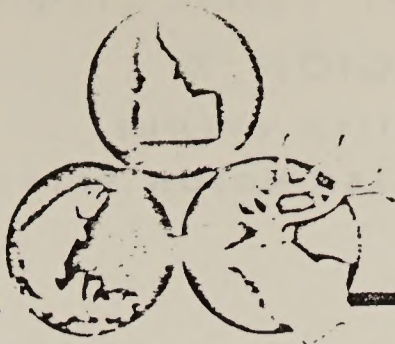
We have reviewed the draft statement as requested in your notice.

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 Rolfe
for 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

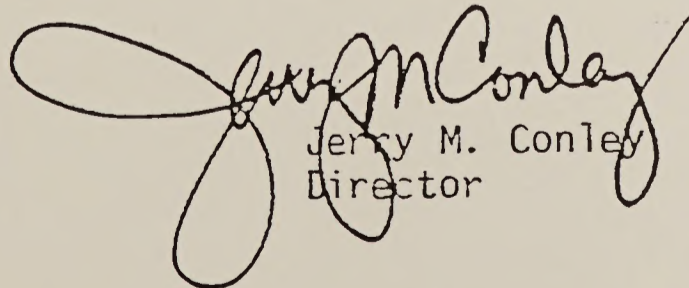
Dear Mr. Walker:

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,

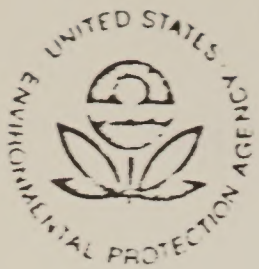

Jerry M. Conley
Director

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

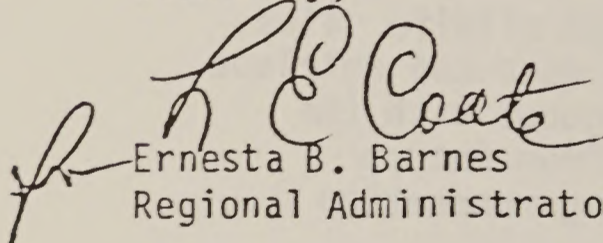
Re: Draft EIS -- Big Lost/Pahsimeroi Wilderness

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

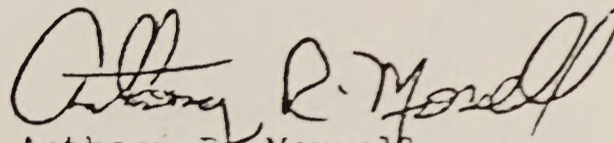
Mr. Kenneth G. Walker
District Manager
Bureau of Land Management
U.S. Department of the Interior
P.O. Box 430
Salmon, Idaho 83467

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



Department of
Internal Security
Washington, D.C.
October 25, 1950

October 25, 1950

Dear Mr. Tolson:
I have the honor to acknowledge the receipt of your letter of October 20, 1950, regarding the matter mentioned therein.

The Bureau of Internal Security
Department of Justice
Washington, D.C.

In view of the fact that the Bureau has been advised that the information furnished to it by the State Department is reliable, it is requested that you advise the Bureau of any change in the information furnished to the State Department.

Sincerely,
John Edgar Hoover
Director



U.S. Department
of Transportation

Federal Aviation
Administration

Northwest Mountain Region
Colorado Idaho Montana
Oregon Utah Washington
Wyoming

17900 Pacific Highway South
C-6896E
Seattle Washington 98168

MAY 16 1995

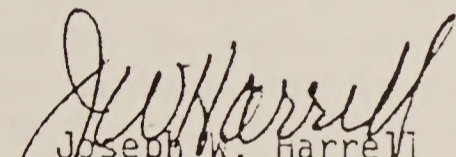
Mr. Kenneth Walker
District Manager
Bureau of Land Management
P.O. Box 430
Salmon, Idaho 83467

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.



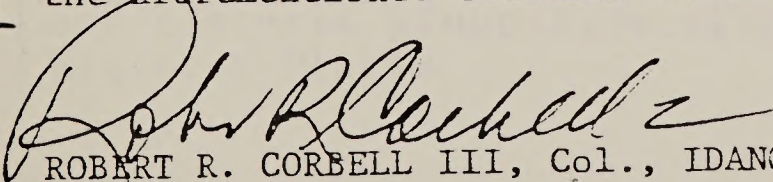
IDAHO AIR NATIONAL GUARD
124TH TACTICAL RECONNAISSANCE GROUP
BOISE AIR TERMINAL (GOWEN FIELD)
P. O. BOX 45, BOISE, IDAHO 83707

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

- 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.

IDAHO STATE HISTORICAL SOCIETY

610 NORTH JULIA DAVIS DRIVE BOISE. 83702



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.

TJG:rm

Sincerely,

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

THOMAS J. GREEN

State Archaeologist

State Historic Preservation Office

GLOSSARY

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

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

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

Management Framework Plan (MFP): The Bureau's basic planning decision document prior to the adoption of a new planning process in 1979. See Resource Management Plan (RMP).

MBF: The abbreviation used by foresters to indicate a volume of one thousand board feet of timber. A board foot of timber is a piece of woody material with the dimension of 12"x12"x1".

MFP Amendment: An amendment to a Management Framework Plan is initiated by the need to consider monitoring and evaluation findings, new data, new or revised policy, a change in circumstances, or an applicant's proposed action which may result in a significant change in a portion of the approved plan.

Multiple Use: "...the management of the public lands and their various resource values so that they are utilized in the combination that will best meet the present and future needs of the American people; making the most judicious use of the land for some or all of these resources or related services over areas large enough to provide sufficient latitude for periodic adjustments in use to conform to changing needs and conditions; the use of some lands for less than all of the resources; a combination of balanced and diverse resource uses that take into account the long term needs but not limited to recreation, range, timber, minerals, watershed, wildlife and fish, and natural scenic, scientific and historical values; and harmonious and coordinated management of the various resources without permanent impairment of the productivity of the land and the quality of the environment with consideration being given to the relative values of the resources and not necessarily to the combination of uses that will give the greatest economic return or the greatest unit output." (From Section 103, FLPMA.)

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Wilderness Review: The term used to cover the wilderness inventory, study, and reporting phases of the wilderness program of the Bureau of Land Management.

Wilderness Stipulation: A special stipulation attached to post-FLPMA leases which details the nonimpairing criteria for activities in WSAs.

Wilderness Study: The process which specifies how each wilderness study area must be studied through the BLM planning system, analyzing all resources, values and uses within the WSA to determine whether the area will be recommended as suitable or unsuitable for wilderness designation.

Wilderness Study Area (WSA): A roadless area or island that has been inventoried and found to have wilderness characteristics as described in Section 603 of FLPMA and Section 2(c) of the Wilderness Act of 1964.

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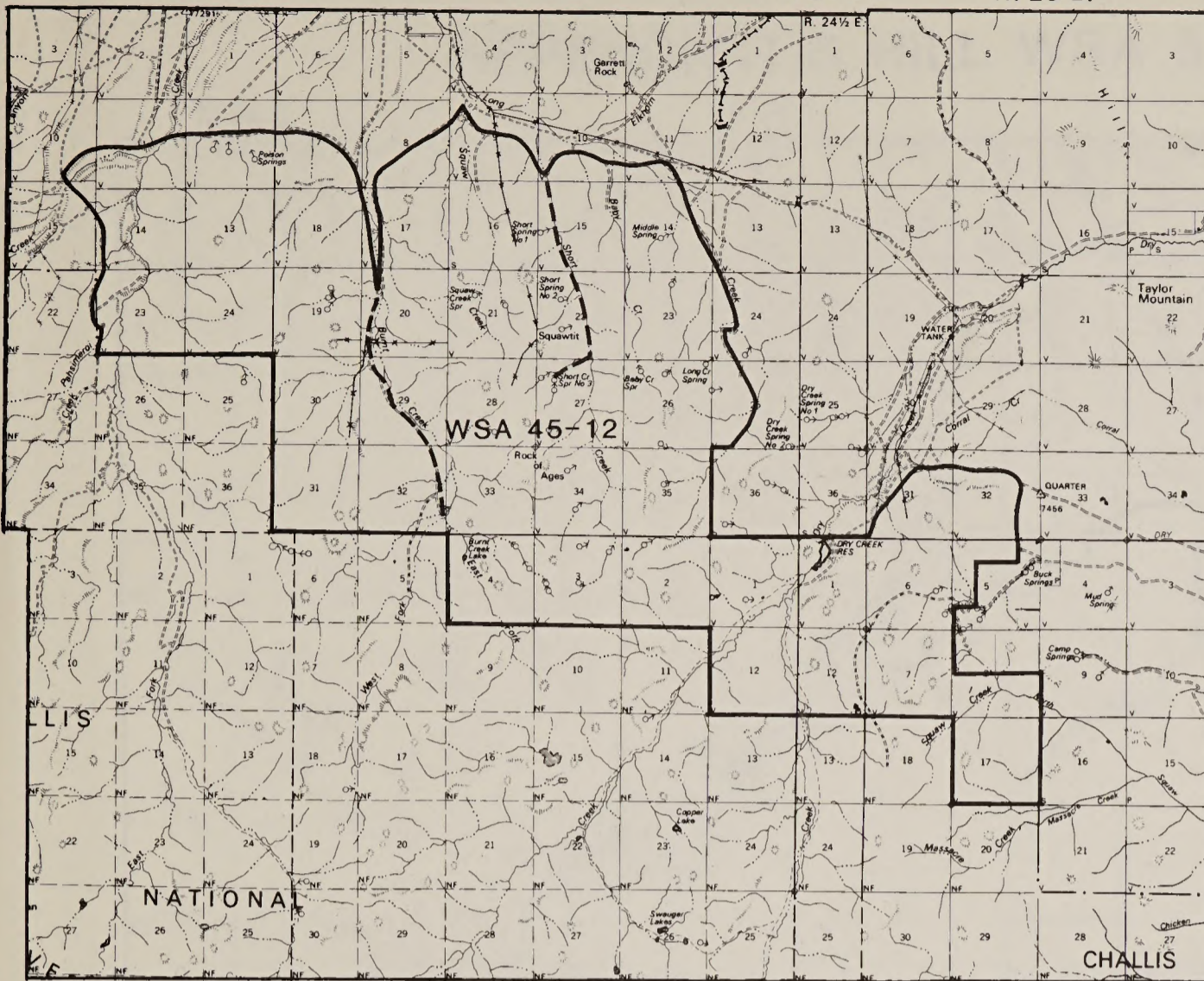
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MAP 3

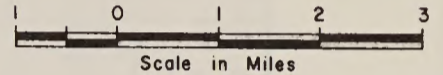
PROPOSED ACTION

T. 10 N.

T. 9 N.



- WSA Boundary
- Recommended Suitable
- Recommended Nonsuitable
- Public Land
- State Land
- Private Land
- National Forest Land



BURNT CREEK WSA 45-12

R. 23 E.

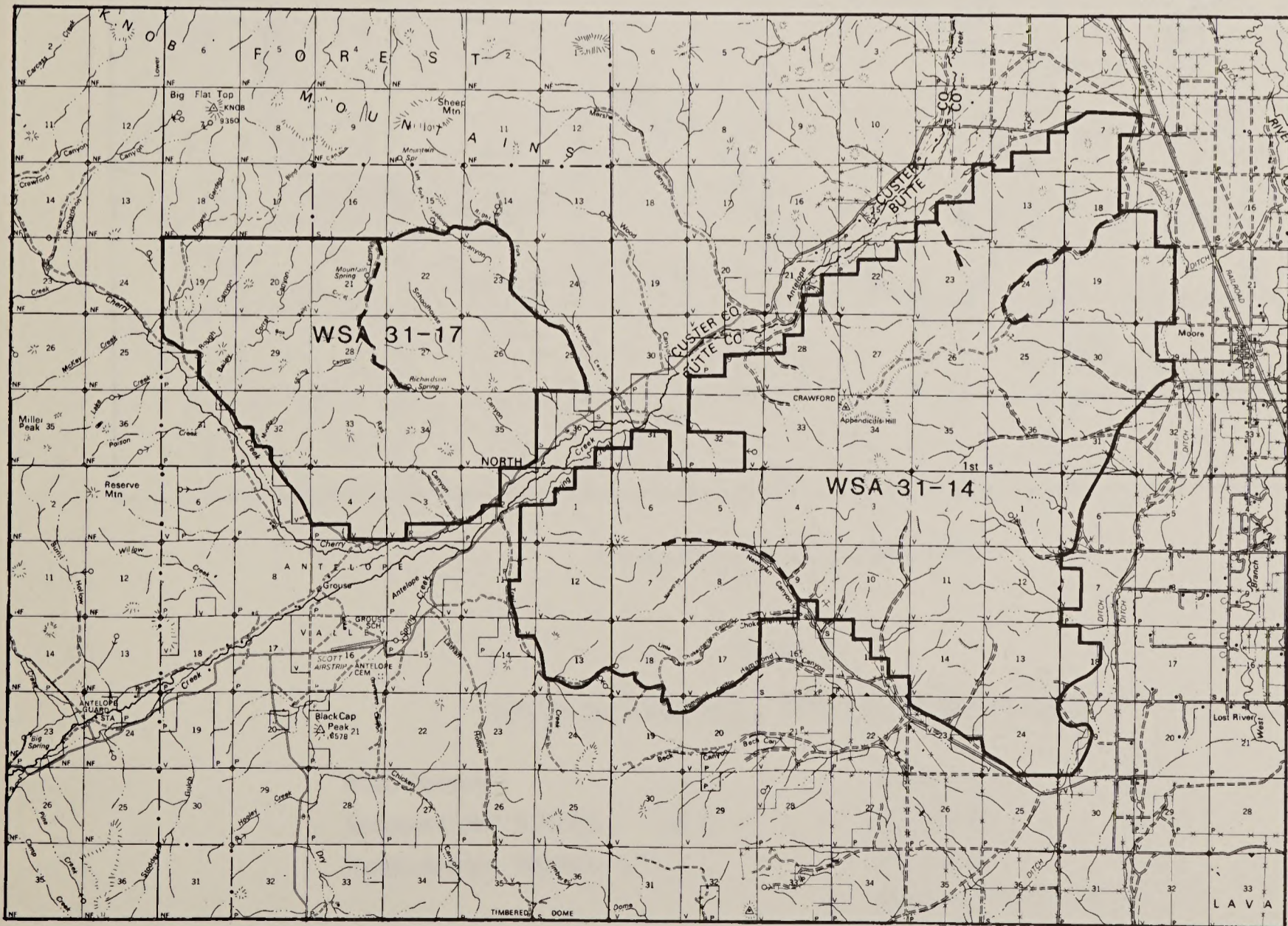
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R. 26 E.

T. 5 N.

T. 4 N.



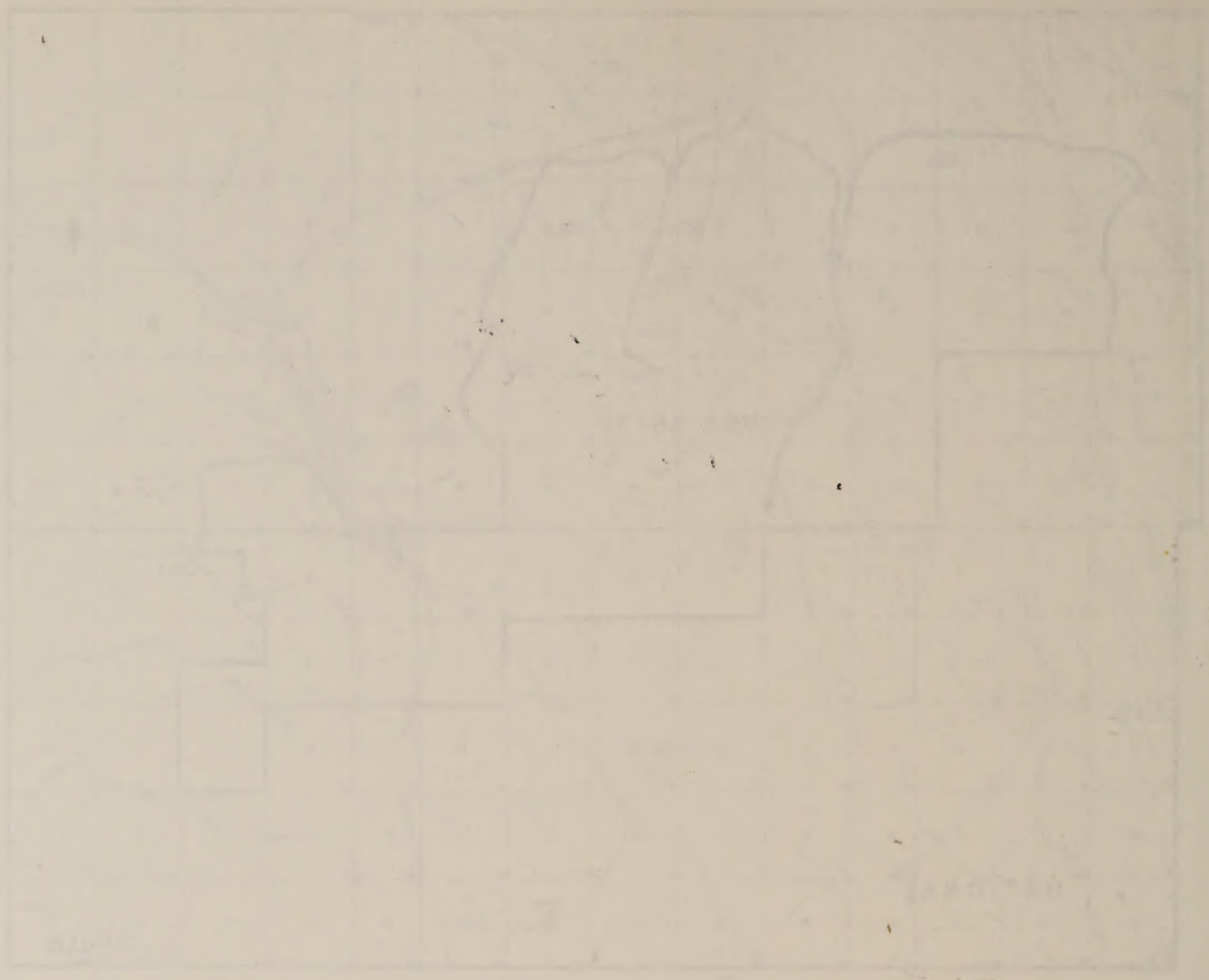
WHITE KNOB MOUNTAINS WSA 31-17

APPENDICITIS HILL WSA 31-14

MAP 3

PROPOSED ACTION

- Proposed Action
- Existing Action
- Proposed Action
- Existing Action
- Proposed Action
- Existing Action
- Proposed Action
- Existing Action

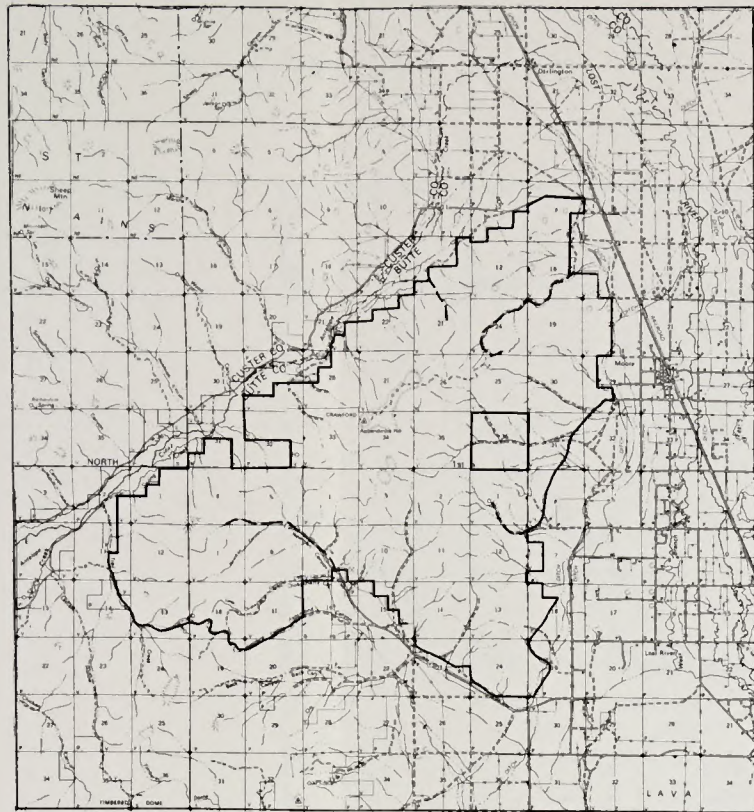


BURNT CREEK WMA 45-19

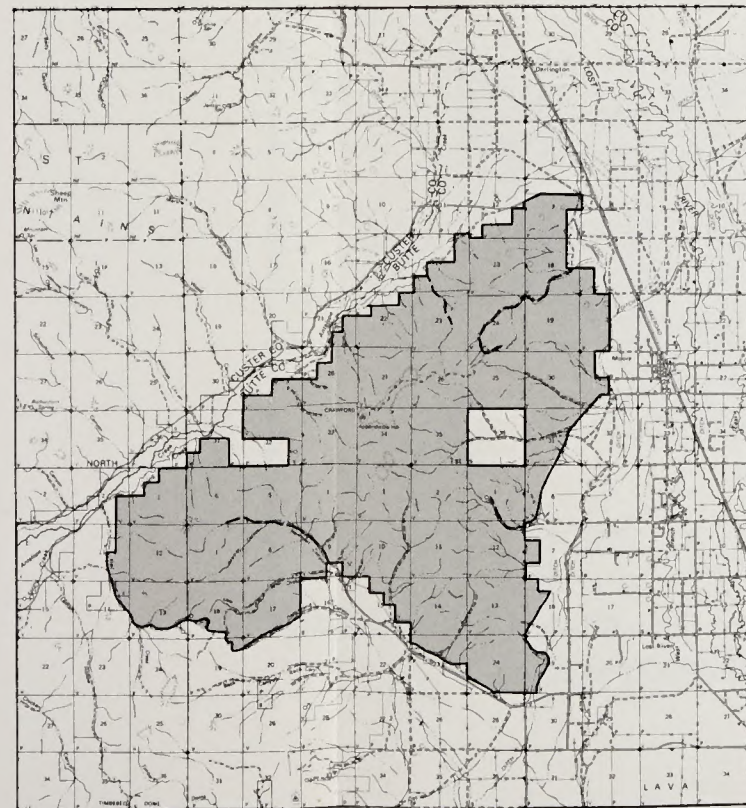


APPENDIX 1 - WHITE KNOB JOINTLESS WMA 41-23

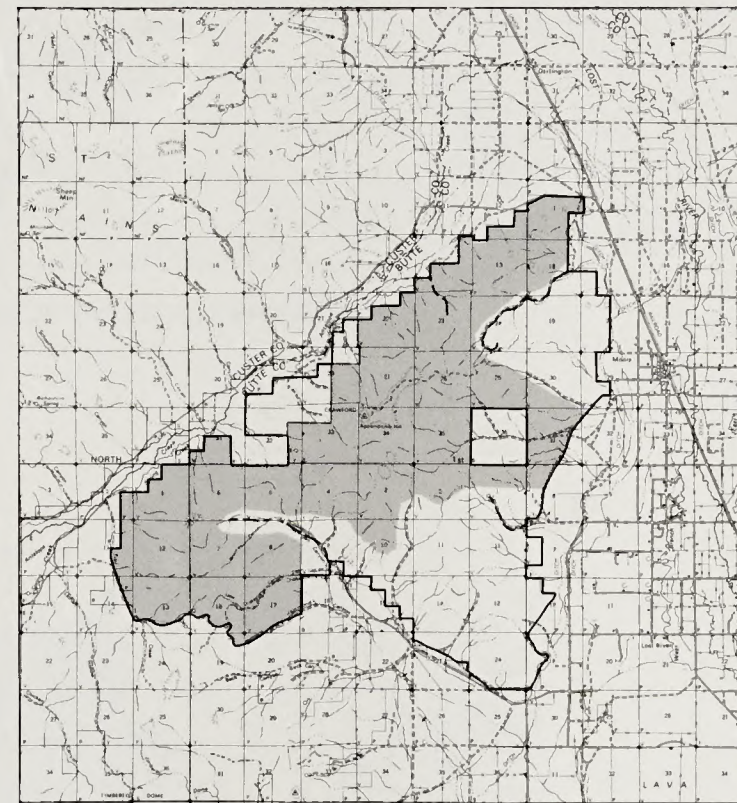
APPENDIX 2 - BURNT CREEK WMA 45-19



PARTIAL WILDERNESS ALTERNATIVE



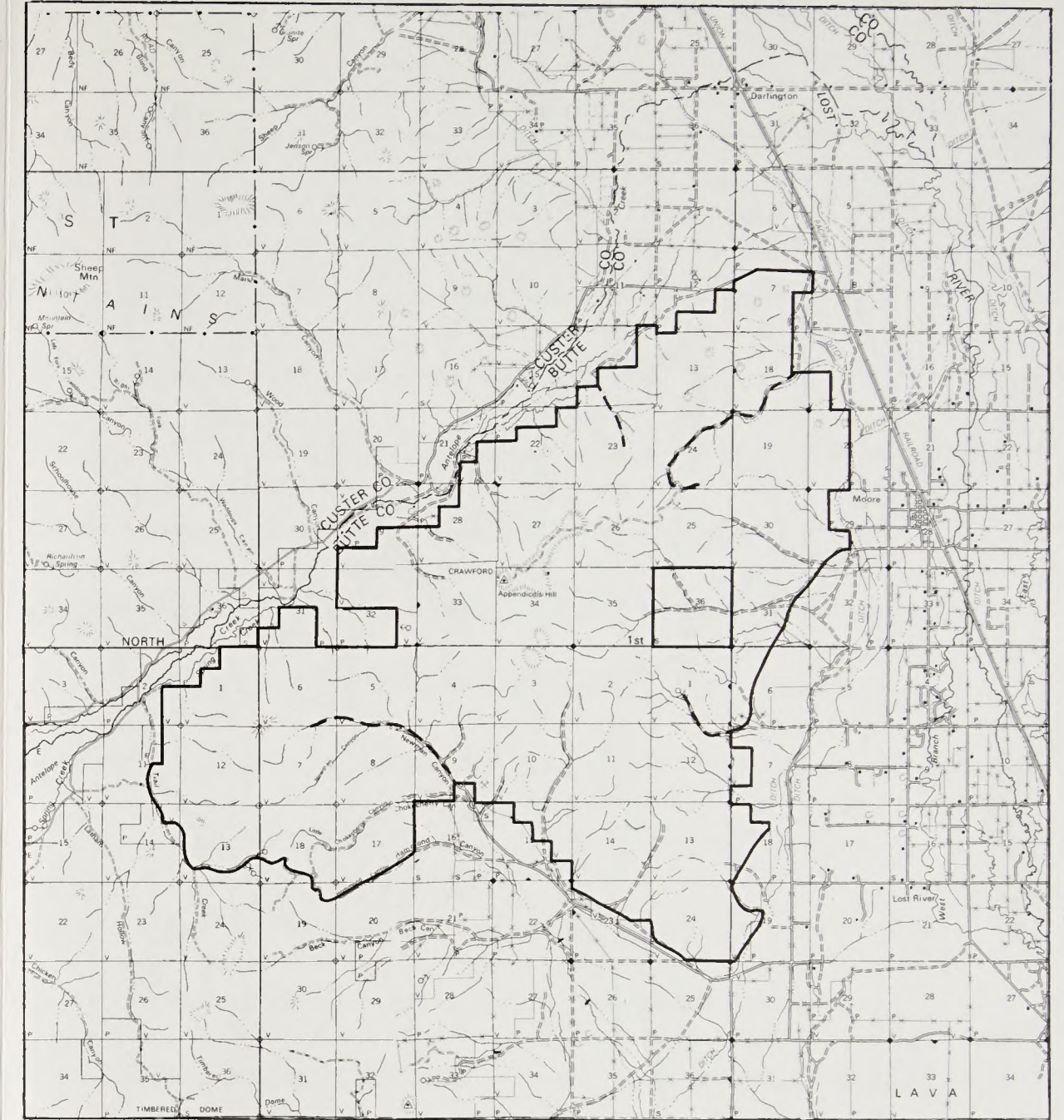
PROPOSED ACTION
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ALL WILDERNESS ALTERNATIVE

APPENDICITIS HILL WSA 31-14

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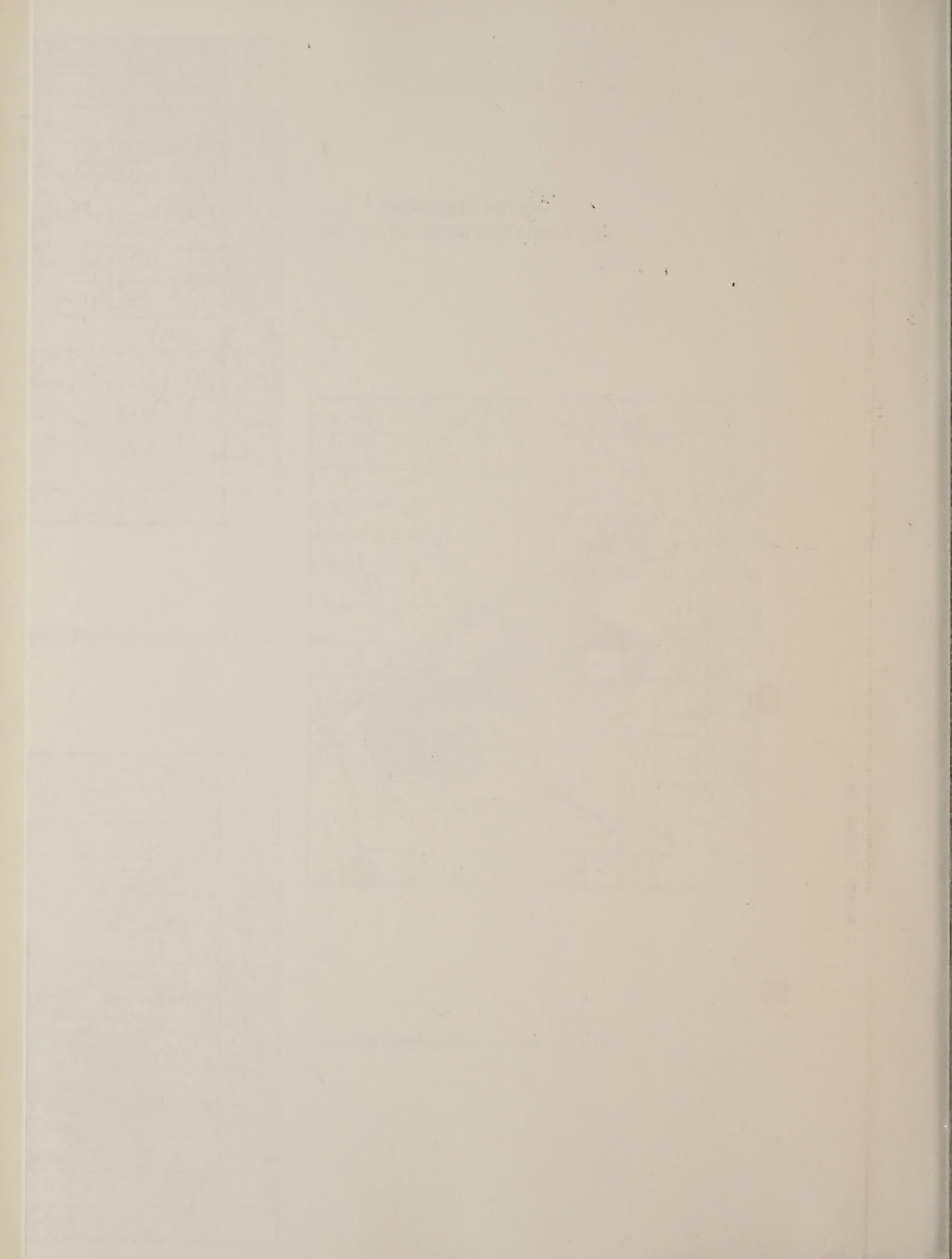


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Scale in Miles

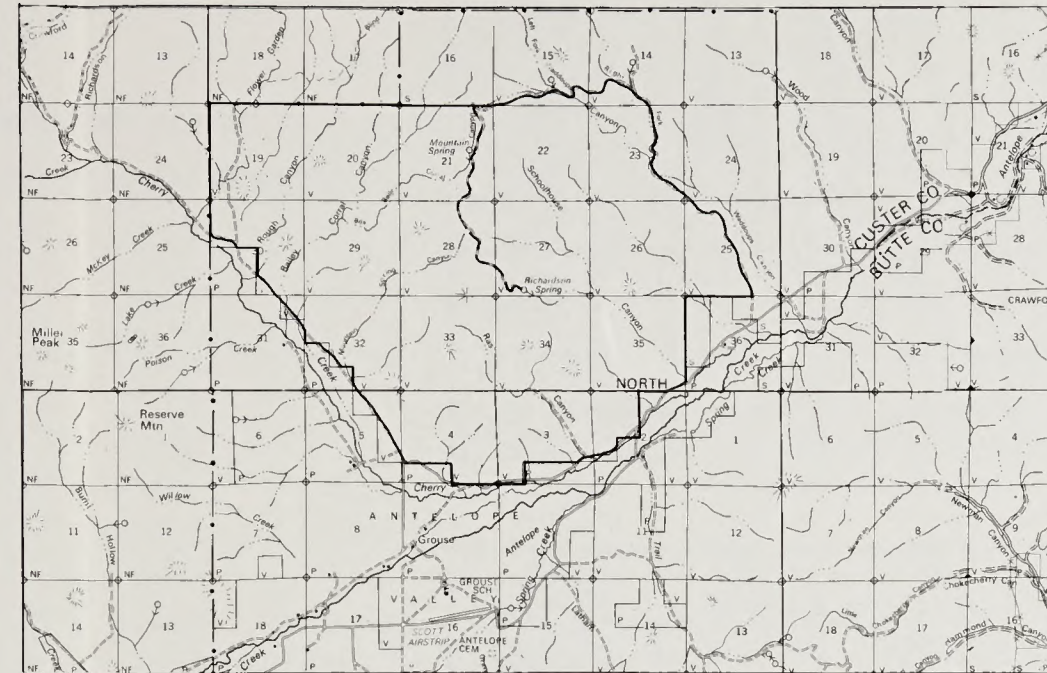
MAP 4

APPENDICITIS HILL WSA ALTERNATIVES

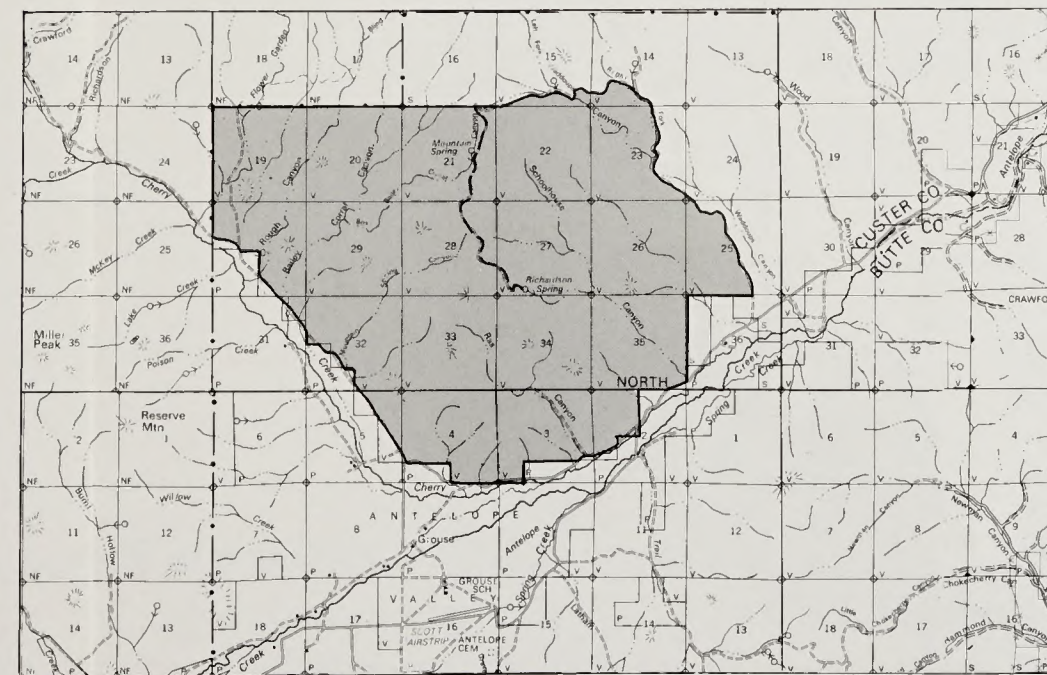
WSA Boundary	—	Public Land	V
Recommended Suitable	■	State Land	S
Recommended Nonsuitable	□	Private Land	P
		National Forest Land	NF



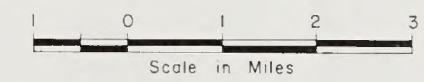
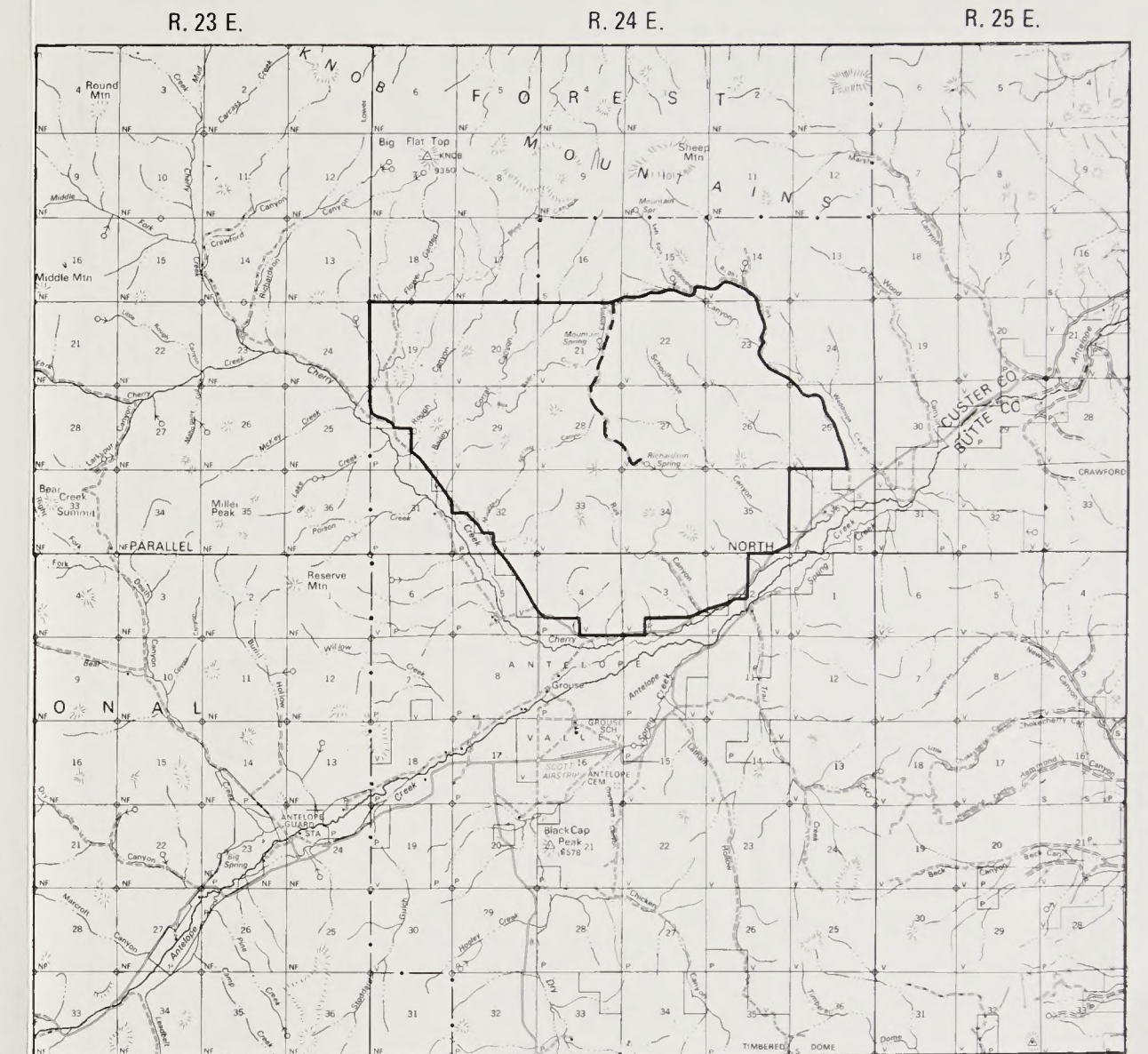
WHITE KNOB MOUNTAINS WSA 31-17



PROPOSED ACTION (NO WILDERNESS ALTERNATIVE)

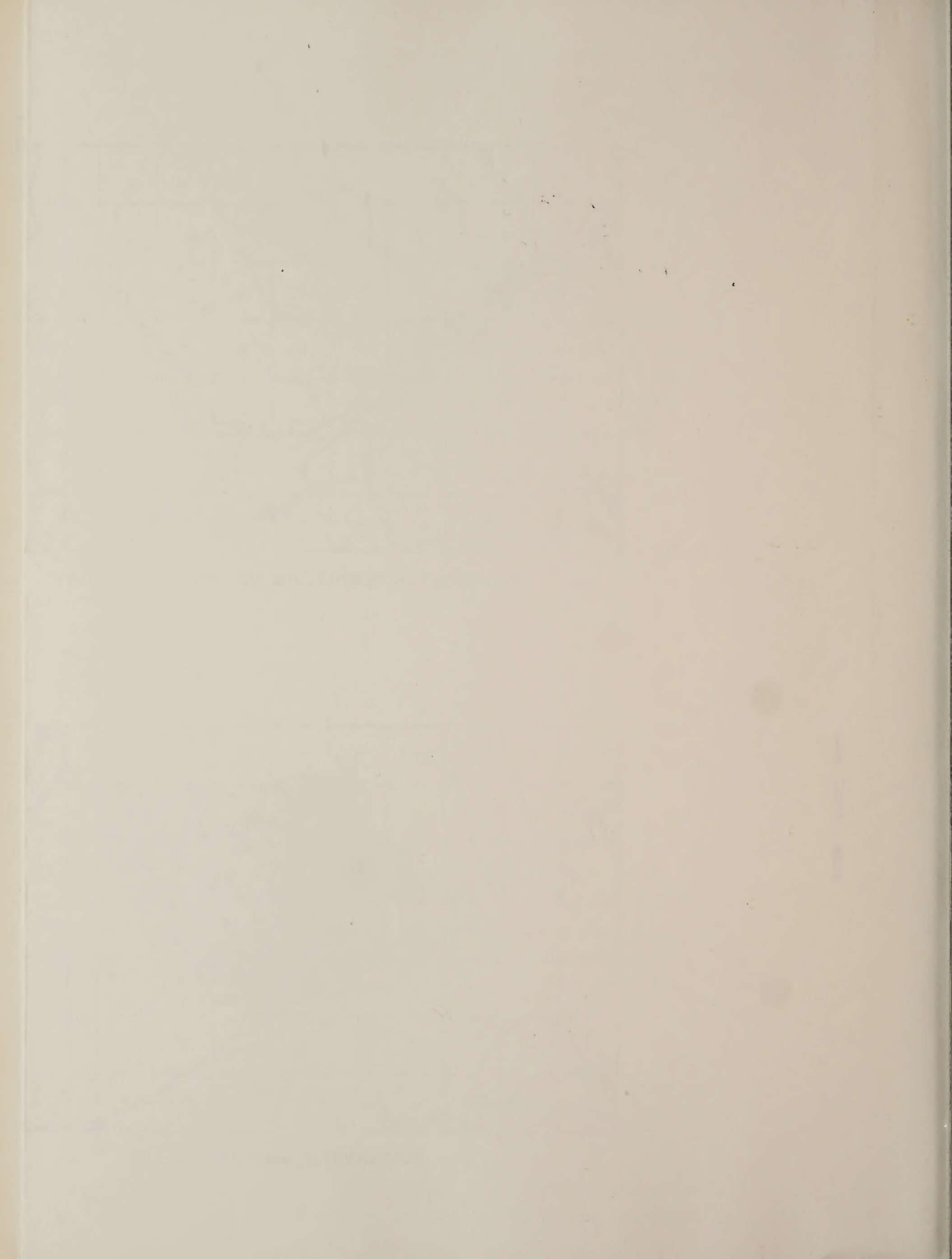


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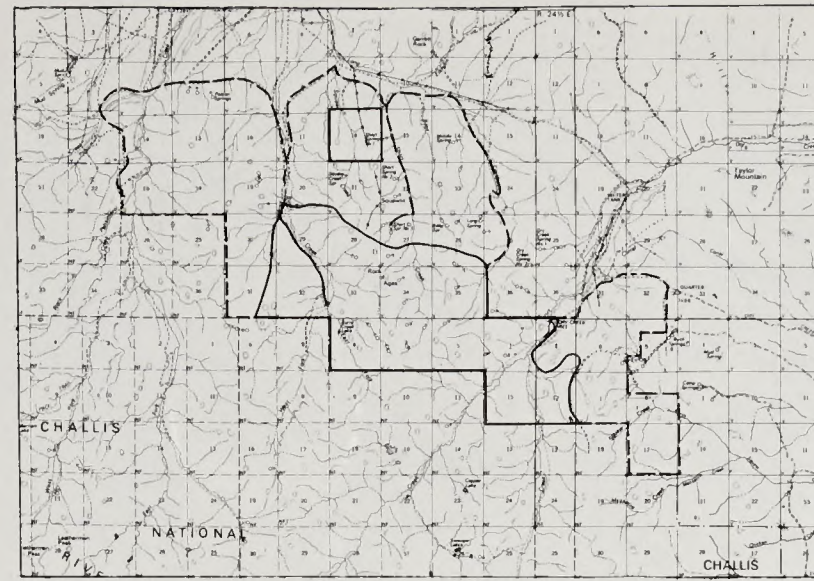


MAP 5
WHITE KNOB MOUNTAINS WSA ALTERNATIVES

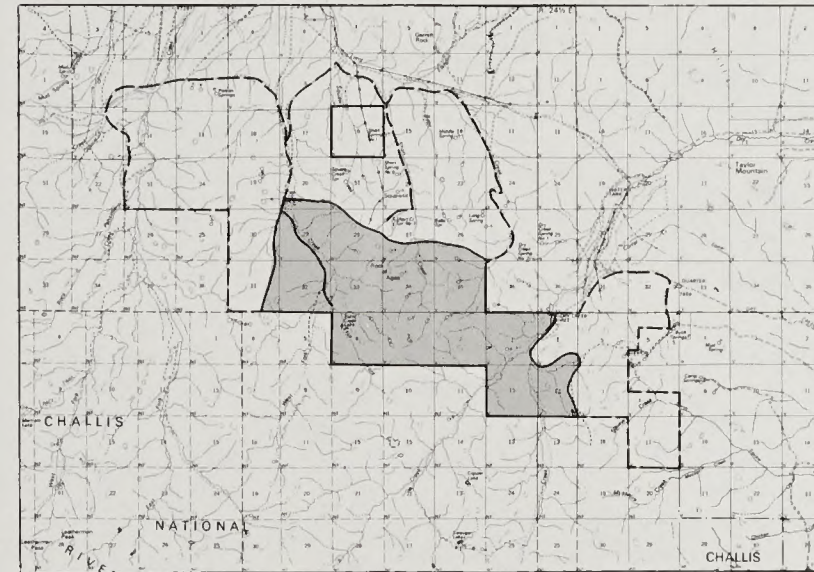
WSA Boundary		Public Land	
Recommended Suitable		State Land	
Recommended Nonsuitable		Private Land	
		National Forest Land	



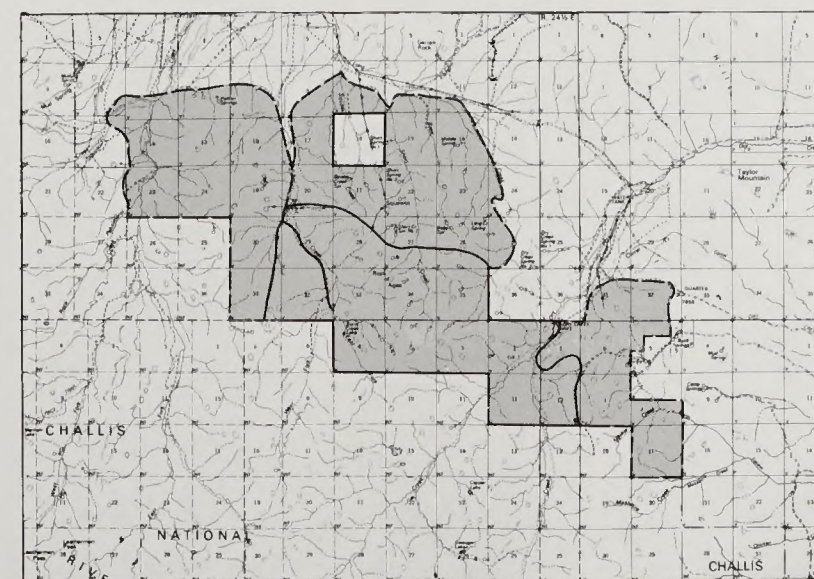
PROPOSED ACTION
(NO WILDERNESS ALTERNATIVE)



PARTIAL
WILDERNESS ALTERNATIVE

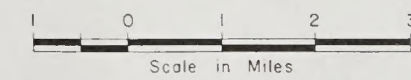
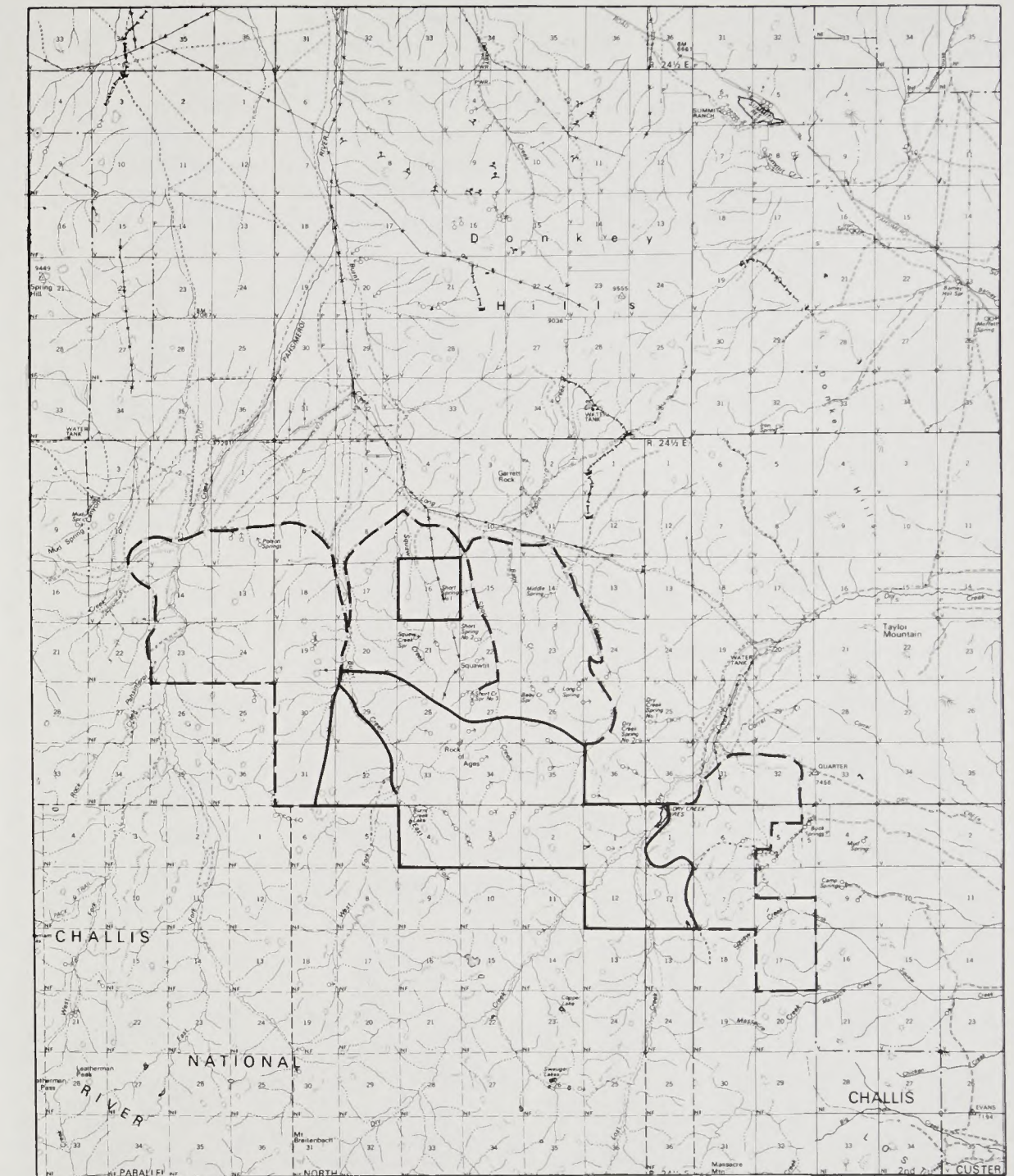


ALL WILDERNESS ALTERNATIVE



BURNT CREEK WSA 45-12

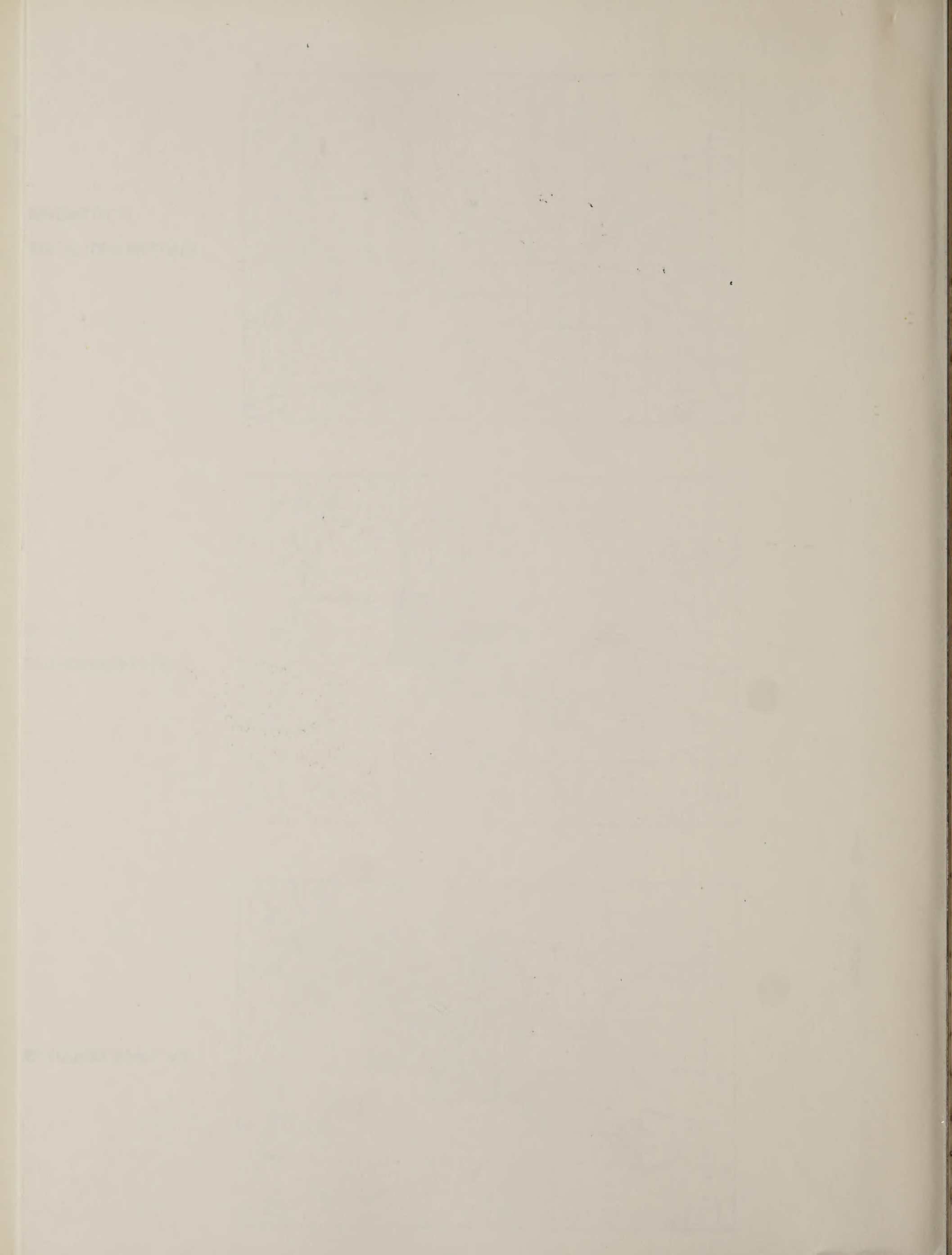
R. 23 E. R. 24 E. R. 24½ E. R. 25 E.



MAP 6

BURNT CREEK WSA ALTERNATIVES

WSA Boundary	—	Public Land	V
Recommended Suitable	■	State Land	S
Recommended Nonsuitable	□	Private Land	P
		National Forest Land	NF



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