1981

Big Desert Grazing, Final Environmental Impact Statement

United States Department of Interior, Bureau of Land Management, Idaho

Follow this and additional works at: https://digitalcommons.usu.edu/idaho_rangeplans

Part of the Environmental Sciences Commons

Recommended Citation
https://digitalcommons.usu.edu/idaho_rangeplans/1

This Report is brought to you for free and open access by the Idaho at DigitalCommons@USU. It has been accepted for inclusion in Range Management Plans (ID) by an authorized administrator of DigitalCommons@USU. For more information, please contact rebecca.nelson@usu.edu.
DEPARTMENT OF THE INTERIOR

FINAL ENVIRONMENTAL IMPACT STATEMENT

PROPOSED RANGE MANAGEMENT PROGRAM
FOR THE
BIG DESERT AREA
(To Be Used with Draft)

Prepared by
DEPARTMENT OF THE INTERIOR,
Bureau of Land Management

Robert A. Horning, BLM State Director
We have forwarded for your review and comment the final environmental impact statement (EIS) on proposed range management in the Big Desert area of southeastern Idaho. The Idaho Falls District Office of the Bureau of Land Management prepared the statement conforming to Section 102(2)(c) of the National Environmental Policy Act of 1969.

The statement describes and analyzes the economic, social and environmental effects of the proposed action and four alternatives for grazing management on 1,162,463 acres of public land.

This final statement differs from past procedures when the entire draft statement was reprinted in the final. This statement includes only those changes that are necessary in the draft EIS and responses to public comments received on the draft EIS.

This document, used with the draft statement, constitutes the final environmental impact statement. This final EIS is not the decision document. The decision will be based on the analysis contained in the final EIS, the BLM’s personnel and budget constraints, public concerns and comments, and other multiple-use resource objectives or programs. No action can be taken for at least 30 days following filing of this statement with the Environmental Protection Agency and distribution to the public. A brief summary document outlining management direction for the Big Desert area will be prepared and made available as soon as a decision is reached. More specific decisions will then be developed on an allotment-by-allotment basis.

Thank you for your interest and participation.

Sincerely,

O’Dell A. Frandsen
District Manager
BIG DESERT GRAZING
ENVIRONMENTAL IMPACT STATEMENT

( ) Draft  (X) Final Environmental Impact Statement

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

2. Responsible Agencies:
   a. Lead Agency: Department of the Interior, Bureau of Land Management
   b. Cooperating Agencies: None

3. Abstract: The Bureau of Land Management (BLM) proposes to implement a grazing management program on 1,162,000 acres of public land in Bingham, Blaine, Bonneville, Butte and Power counties in eastern Idaho. This statement analyzes the economic, social and environmental effects of the proposed action and four alternatives. The proposal and alternatives analyze different levels of vegetative allocations to wildlife, livestock and other uses. It analyzes alternative methods by which livestock grazing would be managed as well as necessary support facilities (such as, water developments, fencing, brush control and revegetation projects). Alternative Four of the Big Desert grazing statement is selected as the preferred alternative.

4. Comments Have Been Requested and Received from the Following:
   See Reviewers and Respondents Section.

5. Date Draft Statement Made Available to EPA and the Public:
   Draft: March 30, 1981
   Final: August 1981

SUMMARY OF PROPOSED ACTION AND ALTERNATIVES

PROPOSED ACTION

Proposed use for the area is to allocate 60,640 AUMs for active grazing use by livestock and 932 AUMs for wildlife. After 20 years, it is estimated there would be an additional 31,766 AUMs which could be allocated to livestock and wildlife. Grazing management proposed for the 582,969 acres consists of rest rotation grazing on 70,032 acres, deferred rotation on 229,925 acres, seasonal grazing on 281,294 acres, and custodial management of 2,238 acres of public land along the Snake River. The proposed range improvements include 9 wells, 38 miles of pipeline, 36 water troughs, 3 reservoirs, 25 water storage tanks, 82.5 miles of fence, 12 cattleguards and 8 miles of road. The potential exists to control sagebrush on roughly 80,500 acres, of which 10,200 acres could be revegetated with desirable plants. An additional 7,800 acres could be seeded without brush control.

Impact Summary

Vegetation would improve in quality and quantity, providing increased forage for both livestock and wildlife.

Wildlife habitat would remain stable or improve in condition. The availability of water is the limiting factor in the unit; the proposed range management program would improve wildlife habitat through increased water availability. Soil erosion would generally decrease and watershed conditions would improve slightly.

The number of hunter days would increase with the increase in wildlife populations.

Ranch consolidation and conversion would not be impacted by the Proposed Action. Capital position would be slightly impacted until sufficient AUMs are regained to restore all operators to their current active preference.

ALTERNATIVE 1 - NO ACTION

The current livestock grazing program would continue. The active grazing preference would remain at 65,217 AUMs. This alternative assumes that the average, annual licensed use for the last 5 years (43,641 AUMs) would continue at this level.

No additional project development or land treatment projects for livestock grazing would occur. Project development for other resource activities would continue under present programs.
Impact Summary

Range condition and vegetation production would show slight improvement. Present erosion and soil compaction would continue. Watershed conditions would not be expected to change much from current levels. Wildlife distribution and numbers are expected to remain the same.

ALTERNATIVE 2 - NO LIVESTOCK GRAZING

All livestock grazing on public lands would be eliminated. All existing grazing privileges and cooperative agreements for range improvements would be cancelled. Salvage rights would be granted to range users who had contributed to range management facilities. Use on intermingled State and private lands would be possible if the landowner or lease holder of the State tract were able to fence lands away from public lands. Forage on public lands would be reserved for wildlife and other resource values.

Impact Summary

All public rangeland in the area would show a long-term improvement. Soil compaction and erosion would decrease on all allotments. Complete removal of livestock would result in little change in wildlife populations from the present situation except that competition for forage would be eliminated. Hunting, fishing and camping opportunities along the river, and hunting and wildlife observation opportunities in the desert would be reduced.

This alternative would have severe impacts on the local livestock industry. As many as 50 permittees might be expected to sell, consolidate, or convert their ranches to other uses.

ALTERNATIVE 3 - INCREASED LIVESTOCK USE

This alternative would implement livestock grazing management without changing existing AUM levels or season-of-use. Livestock would not be limited to any specific utilization levels. Use up to the present active grazing preference of 65,217 AUMs would be allowed. No grazing above this total grazing preference would be authorized until monitoring and studies clearly indicate that additional grazing would be allowed. Grazing systems identified in the Proposed Action would be implemented in this alternative.

Under this alternative, increased levels of land treatment are proposed. Sagebrush would be controlled through burning, spraying or chaining on 116,086 acres. An additional 36,807 acres would be seeded and receive brush control. These range projects would increase livestock forage production. Project size and species limitations would maximize livestock forage production. Livestock reductions would be made during and following land treatment to ensure adequate rest for plant recovery or establishment.

Impact Summary

This alternative would have short-term impacts due to grazing beyond the carrying capacity on 15 allotments. Positive impacts to vegetation would occur once land treatments become established. The long-term annual soil erosion rate would increase. Wildlife populations would be expected to decrease slightly. Opportunities to hunt big and upland game and for wildlife observation would decrease. Neither ranch consolidations or capital position would be impacted.

ALTERNATIVE 4 - GRAZING REDUCTIONS WITH MINIMAL RANGE IMPROVEMENTS

Alternative Four of the Big Desert Environmental Impact Statement is selected as the preferred alternative.

Implementing this alternative would provide the range improvements needed for proper range management. It appears to be preferred by most persons submitting comments, and it is the most cost-effective of the various development alternatives and the Proposed Action.

Forage would be allocated exactly the same as the Proposed Action.

Seasons of use and grazing systems would be the same as described in the Proposed Action, except that seasonal grazing is proposed for Bowers, Cox's Well and Klempel allotments. Four allotments would be combined to create two new allotments: Moonshine and East Butte, and Riverfield and AEC Riverfield. By combining these allotments, reductions would be eliminated in the AEC Riverfield allotment. In both cases, deferred grazing systems could be applied without additional fencing costs.

Grazing management would be transferred to the Idaho Department of Lands as described in the Proposed Action.

The vegetation resource would be managed more intensively, and would lead to substantial improvements in range condition and trend. Vegetation manipulation would be limited to burning on poor and fair condition range only. Projects would be built on allotments receiving reductions, except for Rock Corral and Big Desert sheep allotments. The proposed projects are necessary for implementing grazing systems and improving livestock distribution.

Impact Summary

Range condition and trend would substantially improve. Cover would be expected to increase and erosion and compaction would decrease. Sufficient forage would be available for present and future wildlife populations. A 39 percent increase in the antelope population and an 11 percent increase for sage grouse are projected. Land treatment would cause significantly less impact than the Proposed Action.

The number of hunter days would be expected to increase 10 percent over the next 10 years. Neither ranch consolidations or capital position would be significantly impacted.
ADDENDUM

This section contains corrected information that will change the economic analysis of Alternative 4.

Table 2-18 Project Development and Maintenance Cost, Alternative 4 - Grazing Reductions with Minimal Range Improvements

Table 2-18 in the draft was in error and should be corrected as presented in the following revised table. This change will not affect the analysis of forage allocation, future AUMs, soils, recreation or wildlife.

The change will increase the cost of project development and maintenance for Alternative 4. These corrections will change the economic analysis presented in Chapter 4, Alternative 4. The revised economic section follows.

Page 119

Income: Regional

The BLM would spend $922,000 to install range improvements and perform land treatments. Roughly $169,000 of this amount would be spent in the local economy. Maintenance of the range improvements would cost $12,100 annually, $7,300 of which would be spent locally.

Implementation of this alternative would increase the number of big game and upland game hunter days and would cause an income gain of $3,200 annually by the twentieth year.

Income changes due to changes in AUM levels, construction activities and recreation create additional, or secondary, impacts in the regional economy. Initially, these secondary impacts would be an annual income gain of $27,000. This would gradually change until by the twentieth year the secondary impact would be an annual income loss of $9,600. These secondary gains and losses would be spread throughout the entire regional economy.

The net present worth of the regional income changes associated with this alternative would be +$872,100.
TABLE 2-18

Project Development and Maintenance Cost
Alternative 4 Grazing Reductions With Minimal Range Improvements

<table>
<thead>
<tr>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Pasture fence</td>
<td>32 miles</td>
<td>$2,600</td>
<td>$83,200</td>
<td>111</td>
<td>Permittee</td>
<td>$80</td>
<td>$11,440</td>
</tr>
<tr>
<td>Pipeline</td>
<td>24 miles</td>
<td>$5,000</td>
<td>$120,000</td>
<td>.25</td>
<td>Permittee</td>
<td>$200</td>
<td>$4,850</td>
</tr>
<tr>
<td>Well</td>
<td>3</td>
<td>$35,000</td>
<td>$105,000</td>
<td>3</td>
<td>BLM</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>Reservoir</td>
<td>3</td>
<td>$8,000</td>
<td>$24,000</td>
<td>34</td>
<td>BLM</td>
<td>$100</td>
<td>$3,700</td>
</tr>
<tr>
<td>Brush Control</td>
<td>58,200 acres</td>
<td>$7</td>
<td>$407,400</td>
<td>3,240</td>
<td>BLM</td>
<td>Unknown</td>
<td></td>
</tr>
<tr>
<td>Plow &amp; Seed</td>
<td>4,800 acres</td>
<td>$20</td>
<td>$96,000</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Troughs</td>
<td>15</td>
<td>$1,000</td>
<td>$15,000</td>
<td>Unknown</td>
<td>Permittee</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Storage Tanks</td>
<td>4</td>
<td>$6,000</td>
<td>$24,000</td>
<td>1</td>
<td>BLM</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Cattleguards</td>
<td>7</td>
<td>$3,500</td>
<td>$24,500</td>
<td>20</td>
<td>BLM</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Roads</td>
<td>5 miles</td>
<td>$4,500</td>
<td>$22,500</td>
<td>Unknown</td>
<td>BLM</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
This alternative would initially create an annual income gain of $121,000 in the local livestock industry. By the end of 20 years, this would have changed to an annual loss of $92,000. Roughly $922,000 would be spent by the BLM on range improvements, $169,000 of which would be spent locally. Annual maintenance of the range improvements would cost $12,100 of which $7,300 would be spent locally.

Secondary income gains would initially be $27,000 annually. By the twentieth year this would change to an annual loss of $9,600.

The net present worth of the regional income changes would be $872,100.

There would be an initial employment gain of 11 jobs. After 20 years this would have changed to a loss of 4 jobs.

Neither ranch consolidations nor capital position would be significantly impacted by this alternative.

### Comparative Analysis of Impacts

The following corrections should be made to Alternative 4.

### Range Improvements

<table>
<thead>
<tr>
<th>Type</th>
<th>Cost</th>
</tr>
</thead>
<tbody>
<tr>
<td>Construction</td>
<td>$922,000</td>
</tr>
<tr>
<td>Spending locally</td>
<td>$169,000</td>
</tr>
<tr>
<td>Maintenance</td>
<td>$12,100</td>
</tr>
<tr>
<td>Spending locally (annually)</td>
<td>$7,300</td>
</tr>
</tbody>
</table>

### Secondary Income Changes

<table>
<thead>
<tr>
<th>Year</th>
<th>Change</th>
</tr>
</thead>
<tbody>
<tr>
<td>1-5</td>
<td>+$27,000</td>
</tr>
<tr>
<td>6-10</td>
<td>+$10,000</td>
</tr>
<tr>
<td>11-15</td>
<td>+$210</td>
</tr>
<tr>
<td>16-20</td>
<td>-$9,600</td>
</tr>
<tr>
<td>After 20</td>
<td>-$9,600</td>
</tr>
</tbody>
</table>

### Regional Net Present Worth

$872,100

---

The Big Desert Draft Grazing Environmental Impact Statement (EIS) was filed with the Environmental Protection Agency and released to the public on March 30, 1981. The public review period ended May 29, 1981.

A public hearing on the draft was held May 5, 1981, at the Bonneville County Courthouse, Idaho Falls, Idaho. The hearing was attended by 16 people, 5 of whom presented oral testimony on the adequacy of the draft EIS. BLM responses to the substantive portions of each testimony are presented in this final. A copy of the public hearing transcript is on file at the BLM Idaho Falls District Office.

About 350 draft statements were distributed for review to individuals, federal, state and local governments, and to non-government organizations. All written comments are reproduced in the final. Substantive comments are identified; the BLM response follows the comment. Oral testimony not submitted in writing but with substantive comments is responded to.

All comments will be considered in making final decisions on rangeland management in the Big Desert area.
REVIEWERS AND RESPONDENTS

The following list identifies all agencies, organizations and individuals to whom copies of the draft EIS were sent. Those individuals, agencies and organizations who returned written or oral comments are denoted by a comment and page number.

Federal Agencies

<table>
<thead>
<tr>
<th>Agency</th>
<th>Comment</th>
<th>Page</th>
</tr>
</thead>
<tbody>
<tr>
<td>Department of Agriculture</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Agricultural Research Service - Aberdeen</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Agricultural Stabilization and Conservation Service</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Farmers Home Administration</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Soil Conservation Service</td>
<td>29</td>
<td>40</td>
</tr>
<tr>
<td>U.S. Sheep Experiment Station - Dubois</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Department of Interior</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Bureau of Indian Affairs</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Bureau of Land Management - State Offices</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Bureau of Land Management - Idaho District Offices</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Fish and Wildlife Service</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Geological Survey</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Heritage Conservation and Recreation Service</td>
<td>10</td>
<td>20</td>
</tr>
<tr>
<td>National Park Service</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Office of the Secretary, Western Field Office</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Department of Justice, U.S. Attorney</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Department of Energy</td>
<td>20</td>
<td>27</td>
</tr>
<tr>
<td>Environmental Protection Agency</td>
<td>16</td>
<td>25</td>
</tr>
<tr>
<td>National Advisory Council on Historic Preservation</td>
<td>1</td>
<td>13</td>
</tr>
</tbody>
</table>

State Agencies

<table>
<thead>
<tr>
<th>Agency</th>
<th>Comment</th>
<th>Page</th>
</tr>
</thead>
<tbody>
<tr>
<td>Idaho Department of Fish and Game</td>
<td>23</td>
<td>38</td>
</tr>
<tr>
<td>Idaho Department of Lands</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Idaho State Clearing House</td>
<td>22</td>
<td>35</td>
</tr>
<tr>
<td>Idaho Deputy Attorney General</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Idaho State University</td>
<td></td>
<td></td>
</tr>
<tr>
<td>University of Idaho</td>
<td></td>
<td></td>
</tr>
<tr>
<td>University of Idaho Extension Service</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Colorado State University</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Idaho Division of Health and Welfare</td>
<td>18</td>
<td>26</td>
</tr>
</tbody>
</table>

Organizations

<table>
<thead>
<tr>
<th>Organization</th>
<th>Comment</th>
<th>Page</th>
</tr>
</thead>
<tbody>
<tr>
<td>Ada County Fish and Game League</td>
<td>9</td>
<td>19</td>
</tr>
<tr>
<td>ALC Sportsmen’s Club</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Bonneville Sportsmen’s Association</td>
<td>19</td>
<td>27</td>
</tr>
<tr>
<td>Eagle Rock Longrifle Association</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Federation of Western Outdoor Clubs</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Friends of the Earth</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Idaho Archaeological Society</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Elected Officials, State</td>
<td>Comment</td>
<td>Page</td>
</tr>
<tr>
<td>-------------------------</td>
<td>---------</td>
<td>------</td>
</tr>
<tr>
<td>Rep. Steve Anton</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Rep. W. Rusty Barlow</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Sen. C. E. &quot;Chick&quot; Bilyeu</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Rep. Dwight W. Horsch</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Rep. Kurt L. Johnson</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Rep. Elaine Kearnes</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Sen. Israel Merrill</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Rep. Mack Wm. Neibauer</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Rep. Raymond G. Parks</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Rep. Gary L. Paxman</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Sen. John Peavy</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Rep. Martin Trillohaase</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Sen. Danie Watkins</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Sen. J. Marsden William</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Rep. Darwin L. Young</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Individuals</th>
<th>Comment</th>
<th>Page</th>
</tr>
</thead>
<tbody>
<tr>
<td>All permittees in the Big Desert EIS area (87)</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Reuben H. Babcock</td>
<td>23</td>
<td>35</td>
</tr>
<tr>
<td>Henry Etcheverry, Minidoka Grazing Association</td>
<td>11</td>
<td>21</td>
</tr>
<tr>
<td>Jack Goddard</td>
<td>27</td>
<td>38</td>
</tr>
<tr>
<td>Mr. and Mrs. Harold Smith</td>
<td>13</td>
<td>22</td>
</tr>
<tr>
<td>Tom Stroschein</td>
<td>17</td>
<td>26</td>
</tr>
<tr>
<td>District Grazing Advisory Board (7)</td>
<td></td>
<td></td>
</tr>
<tr>
<td>District Advisory Council (10)</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Jay Anderson, Idaho State University</td>
<td>21</td>
<td>32</td>
</tr>
<tr>
<td>Paul Weebe, Idaho State Journal</td>
<td>7</td>
<td>18</td>
</tr>
<tr>
<td>Patrick Carnahan</td>
<td>17</td>
<td>26</td>
</tr>
<tr>
<td>Jack A. Dotson</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Elanco Products Company</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Brad George</td>
<td>15</td>
<td>23</td>
</tr>
<tr>
<td>Craig Groves</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Karl E. Holte</td>
<td>25</td>
<td>37</td>
</tr>
<tr>
<td>David Letendre</td>
<td>6, 8</td>
<td>18, 19</td>
</tr>
<tr>
<td>C. W. Mulhall</td>
<td>12</td>
<td>21</td>
</tr>
<tr>
<td>Ken Sanders, University of Idaho</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Lee Sharp, University of Idaho</td>
<td></td>
<td></td>
</tr>
<tr>
<td>H. B. Veith</td>
<td>26</td>
<td>37</td>
</tr>
<tr>
<td>Dee Williamson</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Local Government</th>
<th>Comment</th>
<th>Page</th>
</tr>
</thead>
<tbody>
<tr>
<td>Bingham County Commissioners</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Bingham County Planning and Zoning Commission</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Blaine County Commissioners</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Blaine County Planning and Zoning Commission</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Bonneville County Commissioners</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Bonneville County Planning and Zoning Commission</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Butte County Commissioners</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Butte County Planning Commission</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Butte County Extension Agent</td>
<td></td>
<td></td>
</tr>
<tr>
<td>High Country PC&amp;D</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Lost River Community Library</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Power County Commissioners</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Power County Planning and Zoning Commission</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Shoshone-Bannock Business Council</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Southeast Idaho Council of Governments</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Elected Officials, Federal</th>
<th>Comment</th>
<th>Page</th>
</tr>
</thead>
<tbody>
<tr>
<td>Rep. George Hansen</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Sen. James McClure</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Sen. Steve Syms</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
COMMENTS AND RESPONSES

All letters and public hearing comments were reviewed and considered in the preparation of the final EIS.

Although all public comments will be considered when management decisions for the Big Desert area are made, only comments that presented new data, questioned facts or the adequacy of the impact analysis were responded to in this final EIS.

Response to Letters

Each letter received during the review period is presented with a response(s), where appropriate, following the letter. Each substantive comment has been numbered, with the response to each comment following the letter. The letters are presented in the order in which they were received.

Response to Public Hearing Testimony

All oral testimony was reviewed from the public hearing transcripts. Comments that required a response are quoted verbatim and are followed by the response. The remainder of the hearing transcript is available for review at the Idaho Falls District Office.

Advisory Council On Historic Preservation

1522 K Street, NW
Washington, DC 20005

Mr. O'Dell A. Frandsen
District Manager
Bureau of Land Management
940 Lincoln Road
Idaho Falls, Idaho 83401

Dear Mr. Frandsen:

Thank you for your request for comments on the draft environmental statement for the proposed range management program for the Big Desert Area of Eastern Idaho received April 9, 1981. Pursuant to Section 102(2)(d) of the National Environmental Policy Act of 1969 and the Council's regulations, "Protection of Historic and Cultural Properties" (36 CFR Part 800), we have determined that the environmental statement is inadequate because it does not demonstrate compliance with Section 106 of the National Historic Preservation Act of 1966 (16 U.S.C. Sec. 470f, as amended, 90 Stat. 1120). The final environmental statement must include evidence of compliance with the Stipulations of the Programmatic Memorandum of Agreement which was executed between the National Conference of State Historic Preservation Officers, the Bureau, and the Council and which was ratified on January 16, 1980. A copy is enclosed for your convenience.

Thank you for this opportunity to review and comment on the environmental statement. If you have any questions or require further assistance, please do not hesitate to call Charles M. Niquette at (303) 234-4946, an FTS number.

Sincerely,

Louie E. Wall
Chief, Western Division
of Project Review

Enclosure
1-a. Add the following paragraphs to the draft EIS on page 53. E. Cultural Resources.

Because of the size, 1,102,463 acres, included in the Big Desert grazing study, a comprehensive survey to identify all historic and cultural properties that might be eligible for inclusion in the National Register of Historic Places is impossible. However, the BLM has completed an existing data (Class I) inventory of the entire area and identified 2 properties that are included in the National Register and 170 properties that appear to meet the criteria for inclusion in the National Register. In addition, a field sample (Class II) inventory was conducted.

More information about these inventories can be obtained upon request from the Idaho Falls District, however, specific site information on archaeological sites is confidential and will only be made available to State Archaeologists. The inventories were conducted in accordance with the Programmatic Memorandum of Agreement between BLM and the Advisory Council on Historic Places, dated January 14, 1980.

The BLM recognizes that some of the activities involved in implementation of the rangeland management program could affect historic and cultural properties. Because of this fact, the BLM will conduct intensive field (Class III) inventories of specific areas that would be impacted by implementing activities prior to approval. If historic or cultural properties are identified, every effort will be made to avoid adverse effects. However, where that is not possible the BLM will consult with the State Historic Preservation Officer and the Advisory Council on Historic Places in accordance with the Programmatic Memorandum of Agreement by and between the Bureau and the Council, dated January 14, 1980, which sets forth a procedure for developing appropriate mitigative measures to lessen the impact of adverse effects.

2-a
2-b
2-c
2-d

The Idaho Conservation League favors adoption of Alternative Four over the proposed action for the Big Desert area management. The loss of 18,000 acres of sagebrush to a grass monoculture and construction of 83 miles of fence as described in the proposed action could result in serious threats to the survival of some species of wildlife, especially antelope in this area. We feel there are problems with the projections of recreation use, as you show a 50% increase in hunter activity with the proposed action, but a 40% decrease with Alternative Four. We find no reason for this, based on the information contained in your EIS. We are concerned that recreation use other than OHV and hunting use were not addressed. What are they and how much occurs? We suspect some hiking, camping, photography, etc. occur in this area.

We also do not understand the wildlife number projections (how they were determined). If water developments were the criteria, then Alternative three should show similar wildlife increases as the proposed action; it does not. The manipulation of the range through plowing, spraying and seeding is usually detrimental to species diversity and stable wildlife populations. Since the proposed action has much more of this type of activity than Alternative Four, we see no reason why less wildlife would occur under Alternative Four than the proposed action and would like to see this problem addressed. Regardless of the alternative selected, the use of less destructive methods of range management (burning and chaining) are recommended over plowing or spraying. Burning has often been found to be beneficial to wildlife populations if properly designed.

The cost of the proposed action appears excessive in relation to the gains, $1,758,000 to increase grazing by 48,000 AUM's, whereas Alternative Four shows a cost of $654,000 to increase grazing by 46,300 AUM's, much less per AUM than the proposed action. We feel the extra money would be better spent for habitat improvement and restoration than for the minor increase in grazing noted.

In summary, we find Alternative Four to be the most favorable management option, but would like to see our concerns on the recreational use addressed in the final EIS.

Sincerely,

Pat Ford, Executive Director
Idaho Conservation League

May 5, 1981
2-a. The 40 percent decrease shown on Table 2-9 page 33 for hunter days is in error. This should have been a 40 percent increase.

2-b. Recreation use was addressed in Table 3-11, page 55 and in Appendix I-2, pages 104 and 105 of the draft EIS.

2-c. A comparison of Tables 4-6 and 4-7 to 4-22 shows that additional acres of crucial fawning and wintering areas would be impacted. Comparing Tables 4-8 and 4-21 shows that more acres of good and fair range would be affected under Alternative 3. These additional treatments are large enough to limit the population and offset the benefits of water developments.

2-d. There would be a 61 percent decrease in the number of water developments installed in the EIS area in Alternative 4 as compared to the Proposed Action. The fewer water sources for this alternative gives a corresponding decrease in the antelope and sage grouse population.

3-a. The predicted increases in antelope and sage grouse were based on the amount of habitat that would be made usable due to increased water sources and based on the present population. These numbers represent the potential for increase if habitat is made available.

3-b. Chaining and seeding are practical treatment methods. Method for treatment will be determined on-the-ground at the time of project layout. See Chapter 2, page 13, paragraph 2. Chaining may have less impact than plowing and seeding and was included in the analysis. Plowing and seeding is planned only for problem sites, such as poisonous and noxious weed areas, or areas where no perennial seed source exists.

3-c. Unlike the above scenarios, fencing can be detrimental to wildlife populations. Fencing can cause serious problems for migratory antelope. We do not believe the proposed action will result in the increases in antelope and sage grouse populations predicted in the EIS. Alternative four will allow a substantial increase in domestic livestock grazing without excessive destruction of wildlife habitat.

3-d. The Idaho Chapter of the Wildlife Society recommends that alternative four be selected for the Big Desert Planning Unit, instead of the proposed action. The proposed action would convert 34,000 acres of rangeland to grass and add 82,5 miles of fence. This could have serious consequences for antelope since this is an extremely important antelope area. Excessive fence construction could cause serious problems for migrating antelope. The proposed action will result in the increases in antelope and sage grouse populations predicted in the EIS. Alternative four will allow a substantial increase in domestic livestock grazing without excessive destruction of wildlife habitat.

3-e. We feel that the proposed action is financially irresponsible since it recommends spending $358,000 to increase grazing by 44,000 AUMs, an average cost of $8.00 per AUM gained. Alternative four would cost only $144,000 to increase grazing by 44,000 AUMs, an average cost of $3.31 per AUM gained. The 11,000 AUMs gained in the proposed action over alternative four would cost $1,101,000. This is an average cost of $63.78 each. At the present grazing fee of $0.31 per AUM it would take 22 years to pay for the extra AUMs gained by the proposed action over alternative four. The net result is a 130% increase in spending to achieve a grazing increase of 4% over alternative four. The proposed action also calls for 130% more annual maintenance costs than alternative four. If any cost-benefit ratio is applied, alternative four is clearly preferable to the proposed action.

3-f. We understand that brush control in the Big Desert is necessary, and support the burning projects. Burning usually leaves a pattern of burned and unburned areas and can be beneficial to wildlife populations if done correctly. Plowing and seeding or spraying and seeding are generally detrimental to wildlife populations because brush is nearly eradicated in the treatment areas. We feel that chaining and seeding is a better treatment measure because it allows some brush to be left for wildlife while increasing grass for domestic stock. In the EIS the BLM does not appear to have considered the use of chaining and seeding. This is a true multiple-use management practice as called for in the Organic Act. Plowing and seeding is basically a single-use management practice.

Thank you for providing the opportunity to comment on this EIS.
General input -1 polled members of IDAHO WILDLIFE FEDERATION, FIFTH DISTRICT, on proposed range management program for THE BIG DESERT AREA. Having received and reviewed the E1's of 1981, ALTERNATIVE #1, NO ACTION. It is not considered as acceptable. ALTERNATIVE #2, NO LIVESTOCK GRAZING is not acceptable or feasible.

ALTERNATIVE #3 Increased livestock use could be feasible and beneficial to livestock permits and if the projection of wildlife occurs as proposed, they will benefit also. As the draft reads, the proposed use for the area is to allocate 60,640 AUM for active grazing use by livestock and 932 AUM for wildlife. After 20 years, it is estimated there would be an additional 31,766 AUM which could be allocated to livestock and wildlife.

The proposed #3 reduction of grazing AUMs for a total of 59,917 AUM. This would still be 16,000 AUM above the 5 year average. The plowing and seeding has varying effects for different species and involves a higher cost of work done. Plowing and seeding appears to run between $25 and $30 per acre. The grazing would be reduced until the vegetation is stabilized. If the normal average acreage is 10-15 acres per AUM, and we see that on created wheat grass the acres AUM are 3 acres a unit, it is apparent that created wheat grass is one of the grasses that should be used. The negative side of this is that plowing would kill preferred forage and native grasses. These forbs are the ones that antelope feed on. The plowing would change the 5500 acres of FAIR 1 range to POOR 2 for antelope.

Plowing and seeding would have impact on the sage grouse. The Big Butte strutting ground could be made unusable. It is the only identified ground in the Big Butte allotment. Several other areas of strutting grounds and nesting grounds would also be affected. (See Chapter 4, page 77)

According to the ecological conditions chart by percentages, we see a change in 20 years from:

<table>
<thead>
<tr>
<th>PRESENT</th>
<th>FUTURE</th>
</tr>
</thead>
<tbody>
<tr>
<td>Poor</td>
<td>7%</td>
</tr>
<tr>
<td>Fair</td>
<td>93%</td>
</tr>
</tbody>
</table>

Table 3-3, page 9, shows that alternative #3 would cost approximately $9,338,900 to implement. In 20 years, this action would show an increase of 31,766 AUM or a total projected 92,406 AUM total.

Alternative #4, same page shows a total of 88,867, or a total of 3,721 AUM less than alternative #5. The total cost of #4 alternative is shown as $6,654,600. That leads us to the fact that 3,721 AUM will cost $1,874,300. That seems to be a high price to pay for so few AUMs.
Our feeling and suggestion is that alternative #4 be used. With the chain dragging, either 1 or 3, depending on the need of the area and the need of the canopy cover. Some controlled burning would be effective. The stock driveways should be plowed and seeded. A close look taken at Webb Spring to see if the proposed increase in troughs and pipeline development possibly would have the effect of drying the spring up. Stabilize livestock level for the period needed to promote the level of forbs and vegetation needed for both livestock and the wildlife. Alternative #4 would be much less expensive to implement. It would provide very nearly the same AUMs as #3. It would save the adverse impact of short term loss of vegetation productivity. If chained in strip drag and #3 shaped drag, it would not alter the #1 sage grouse strutting grounds or wipe out the brood rearing areas.

The statement is made in the draft EIS that fences would increase the risk of antelope mortality. We feel that as few fences as absolutely necessary are to be put in and the ones that are, should have a 10" to 12" high bottom wire for antelope to crawl as they move to feed or water or as they migrate.

The purpose of the proposed action is to provide adequate forage in the long term to stabilize the local livestock industry and to meet wildlife needs. We feel that alternative #4 should be done economically and by so defined, #4 would be best benefit wildlife in the area.

Submitted by

Jerry L. Hayes
Chairman Fifth District
Idaho Cattlemen's Federation

Idaho Environmental Council

P.O. Box 1708
Idaho Falls, Idaho 83401

May 5, 1981

Comments on the BLM Big Desert Grazing Draft EIS

The BLM people who worked on the draft EIS for the Big Desert Grazing Proposal are to be commended for the obvious hard work they performed. However, the IEC does not agree with the conclusion, namely the Proposed Action. It would cause too much adverse impact on wildlife, with many miles of fences, brush control with spraying, plowing, and seeding, and would also waste money.

Alternative #2 would call for much less development and would produce much less impact on wildlife. It would also be much more cost-effective, and would still produce nearly as many increased AUM's as the Proposed Action.

Alternative #2 would entail 12 miles of fence instead of the Proposed Action's 8 miles. It would entail 5 miles of road instead of 3 miles, 15 miles of pipeline instead of 37; 3 wells instead of 9, and would call for spray and seeding and/or plow and seeding on 6,000 acres instead of 18,000. Further, it would cost $1.65 million instead of $1.752 million. And it would produce an increase in grazing of 6,259 AUM, almost as much as the 6,000 AUM of the Proposed Action. But the cost per AUM gained over the 20 years would be only $11.35, not $36.30.

In other words, we can get 96% of the increased AUM's of the Proposed with Alternative #2, but with only 37% of the cost. This in addition to causing less damage to habitat.

Alternative, the No Action option, may be more cost-effective than Alternative #2; it's hard to tell from the EIS. But it is obvious that Alternative #1 is economically and environmentally superior to the Proposed Alternative.

We support the following:

1. Control of sagebrush by burning if it is done to resemble natural burns, which usually produce a mosaic of benefit to wildlife as well as to livestock.

2. Treatment of the 1500 sheep driveway. Chaining might be better for wildlife than plowing however.

3. A sheep turnout date of April 15th for the native grasses, and of April 1 for the existing treated wheatgrass plantings.

4. Status quo on land within the IDEL closed to grazing.

Thank you for the opportunity to comment.

Jerry Hayes
IEC Board
Dear Sirs,

I am commenting on the Big Desert Grazing Draft Environmental Impact Statement.

I would like to see Alternative 4 implemented but with more consideration given to the ferocious hawks and coyote curlews. There are both sensitive species that nest or the ground and with increased grazing they may be irreparably harmed.

I would also like to see less off road vehicle use.

I again would like to see Alternative 4 implemented with these changes mentioned above.

Thank you.

Patrick Carroll

7-a. During the development of allotment management plans (AMPs), each allotment will be analyzed again. At this time, additional consideration will be given to areas used by sensitive species.
BL M -

Regarding the desert EIS - I favor Alternative #4 because it is the most economic, and the best alternative for livestock/wildlife taken together.

DAVID LETENDRE
1677 WARFIELD
IDAHO FALLS, ID

O'dell Frandsen
Bureau of Land Management
940 Lincoln Road
Idaho Falls, Idaho 83401

Dear Mr. Frandsen:

The AEC Sportsmen's Club has reviewed the Draft Environmental Impact Statement for Big Desert Grazing and recommends that Alternative 4 be adopted rather than the Proposed Action. Considering the total amount of environmental manipulation, the total costs, the increase in AUM's along with the incremental costs for the additional AUM's, we feel Alternative 4 is the most cost-effective approach.

The Proposed Action while reflecting a comprehensive development and range improvement program results in far more land subjected to radical treatment by spraying and seeding, resulting in less post-treatment diversity which is less preferable for wildlife. Treatment by burning or chaining should be used to the maximum extent.

The total increase in AUM's for the Proposed Action and Alternative 4 are similar yet for the 3's increase of 2821 AUM's allowed by the Proposed Action the cost increases by 168%. We question the prudence of such an expenditure.

Additionally, we question the accuracy of the following items in the draft EIS:

1. A projected 100% increase in antelope populations is attributable primarily to increased availability of water. The water will be drained by ranchers by September 15 to prevent freezing, yet mid-September to mid-October is an extremely dry period and any antelope dependent on new water development would have to move during this period. This probably would not support the increased population.

2. There is a 50% increase in hunter days under the Proposed Action while a 40% decrease in hunter days under Alternative 4, even though both actions produce increases in game species. This appears inconsistent, and recommend that Sportsmen's receive their fair share of the benefits.

We do not consider the other alternatives described in the draft EIS as viable alternatives when all factors are considered. Alternative 4 is a good course of action and recommend its adoption. We appreciate the opportunity to submit comments.

Jim Solecki
President
9-a. The higher price of the Proposed Action is due to more projects such as water developments and fences which provide for much better livestock distribution. The AUMs are similar under the Proposed Action and Alternative 4, but under Alternative 4 many of the AUMs would be unusable without the improvements. Also under Alternative 4, the cost of hauling water would be substantially higher without the water developments of the proposed action.

9-b. The livestock operators would drain only the pipelines around the control valves. There would still be water in troughs and tanks that will not be damaged by freezing because of their design. This water would be available for wildlife use until the snow provides necessary moisture. In addition, rainfall should provide sufficient supplemental water. The need for water should also be reduced due to cooler temperatures. Additional water independent of pipeline systems, such as guzzlers, would also be provided for wildlife purposes.

9-c. See response 2-a.
Dear Mr. Franson,

We, the members of the Minidoka Grazing Association, wish to go on record as being strongly opposed to the proposed April 15th opening date on the Big Desert.

Our organization has a unique arrangement with the Deshler district concerning the opening of the grazing season. In latter times on the district together with BLM personnel, agree on an opening date depending on conditions of the feed and weather rather than depending on a set date regardless of those conditions. We think of ourselves as good stockmen and responsible users of the public lands and we want only to preserve and improve the range. Therefore, we believe setting such a late date will not be in our best interest and it would serve no positive purpose for range improvement. Range readiness should be the determining factor for the opening date.

Sincerely,

Henry Etchecolry
Secretary - Minidoka Grazing Association

C. W. Mulhall
May 25, 1981

Bureau of Land Management
130 Lincoln Road
Idaho Falls, Idaho 83401

Gentlemen:

I would like to offer some comments on the Big Desert Grazing Proposal, about which an article appeared in the May 21, 1981, Park Record.

Our family has owned several thousand acres out in the west side desert for many years, about 40 years, in fact. We have watched many changes, and have, over the years, come to develop a love for the land.

Our state is changing fast, and as the population grows, there is bound to be increasing pressure from those who wish to make more from the public lands, and improvement of lands who cannot leave nature alone.

In my opinion, the most valuable long term use of the west side desert will be to keep your hands off it. Idaho still has a priceless heritage of open all country, and this cannot survive when tampered with.

 Idaho's life cannot function without the instruction of its native habitat by the federal employees, or others who cannot leave nature alone.

For those on the federal payroll, it may seem like a good idea to invent their programs, in order to justify their jobs.

In my opinion, they must step in, then step out, and still become lonely animals at all of the land.

C. W. Mulhall

May 25, 1981

Bureau of Land Management
130 Lincoln Road
Idaho Falls, Idaho 83401

11-a. Phenological data and past history of use have shown that April 15 is a better average turnout date than April 1 on the Big Desert. We will continue to be flexible on this new turn-out date as stated on page 13, paragraph 2. It is also recognized that crested wheatgrass ranges reach range readiness before native ranges.
TO O'DELL FRANDSEN

MAY 26, 1981

Topic: Testimony on the Big Desert Grazing Alternatives.

After reading over the Environmental Impact Statement on the Big Desert Grazing plan, I feel I must support Alternative A, which calls for a grazing reduction with minimal improvements.

Being raised in the great outdoors of eastern Idaho, I have had an opportunity to see firsthand, a good deal of the Arco desert. I have seen some areas rich in wildlife value, but other areas have been so overgrazed by livestock, that its quality for wildlife is almost nonexistent.

I am against any spraying or poisoning of any plants found in the Arco desert. I would rather see burning or plowing, but never spraying. The problem with spraying as I see it, is that 1) it is not selective in what it kills, and 2) its affects are long lasting, both in the areas sprayed, and in the water system that it will eventually run into.

Tall sagebrush stands, though poor in food value to livestock, must be protected. These stands offer wildlife many valuable uses, 1) It offers nesting birds good sheltered areas in which to raise its young, 2) It offers big game animals such as Pronghorn Antelope and Mule Deer excellent fawning areas, 3) It offers all wildlife protection from predators, and 4) It offers all wildlife an excellent protection from the sun. Very few animals benefit from land absent of cover, so the tall sagebrush stands can and must be protected from burning or plowing, and the over abundant livestock, which often ruin such areas.

May 25, 1981

O'Dell Frandsen
Manager of Land Management
200 Lincoln Road
Jackson, Wyoming

13-a. Existing photo trend plots in each of the pastures in the Smith allotment show them to be in a downward trend.
When the minimal improvements are carried out, I hope barbed wire fences will not be added to existing fences. I have seen large numbers of wildlife like deer, antelope, and even owls, caught in these death traps, and in my opinion a needless death.

It is also my hope, that instead of using cow troughs to water livestock, that guzzlers would be used instead. Although wildlife like deer and antelope can use these troughs, many smaller mammals and birds cannot. Even if platforms were built upon them, birds like sagegrouse will refuse to use them, since they will only water with their feet on the ground.

When your improvements are carried out, if you keep wildlife and livestock in mind when deciding on how to carry out these improvements, then livestock and wildlife will both be able to flourish on the Arco desert.

Thank you
Fred George
1265 Monte Vista
Pocatello, Idaho

14-a. All water developments would be designed with multiple use in mind. This would include consideration for small game and birds, including sage grouse.

Jack A. Dotson
R. R. Box 40
Sterling, ID 83340

May 27, 1981

O'dell Frandsen
Bureau of Land Management
940 Lincoln Road
Idaho Falls, ID 83401

Dear Sir

The following is my comment on the Rio Desert Grazing Draft Environmental Impact Statement, dated 1981.

My first objection to the E. T. S. is that there is no rainfall statistics indicated in the five year study that was done during a drought period. There is no adjustment for normal or above normal precipitation averages.

Range conditions will improve normally with or without B.L.M. practices, with a layman's guess of 20 percent. I am all for range improvement, but I do not want the rainfall forgotten. It is the most important part of desert range conditions and management must follow suit. It is hard for me to understand how, with the knowledge we have involved in this study, that it could be ignored.

In this area we have had one of the worst droughts in history, especially in 1977 and 1978. There was only one-half inch of snow on the ground through winter. Page 38, presents trend data is very much affected, but precipitation and rainfall is not mentioned.

Page 39 of allotment 7000 shows considerable downward trend and note it in a sheep allotment. Most other cattle allotments are even. Yet on page 113, table 4-29, a twenty year projection shows a 64 percent gain in carrying capacity for sheep compared to much smaller amounts for cattle allotments. It is also apparent on pages 102, 65, and 66. All four alternatives show this. . . . I am left wondering why.

On page 107 under economics, the last half of the paragraph indicates that it's economics, because there is not a long enough utilization of public lands and cheap fee. Yet, under your proposed action, it has its own solution to the problem. (Pages 54, 56), and 64. But on page 84 under sheep compared to cattle, it shows a 32 percent increase. No increase to cattle. It is necessary to refute this statement as being factual-for reasons (or purposes) of carrying capacity or damage to vegetation.

15-a. Rainfall data were considered and vegetation was adjusted accordingly. This information is presented in Appendix C-1, page 134, paragraph 4. More detailed rainfall data are available at the Idaho Falls District Office.
15-c. The budgets used in this document were developed in consultation with ranchers in the EIS area. The weaning weights, calf crops, and death loss figures are based on data collected by the U.S. Department of Agriculture, verified by a sample of ranchers in the EIS area, and provided to all ranchers in the area for comment prior to their use. Any adjustments necessary, whether due to drought conditions, disease, low cattle prices or any other factor should have been identified at that time. Because no adjustments were identified, it was assumed that these budgets reflect the representative ranch operation in that particular group.

The inflation adjustment identified on page 174 is not related to the price of beef used in the budgets. On page 56, total regional and total farm income are discussed. The latest year for which this data was available was 1978. This data was compared to the 1974 level of total and farm income. Comparisons of this type must be done in equivalent dollar terms by removing the effect of inflation over the 5-year period. This was done by inflating the 1974 figures to equivalent 1978 figures as shown on page 174.
16-a. Every ranch operation is different. Some ranchers may be able to use the extra AUMs to be provided. They may have more private grazing lands and commercial leases available to them than does the "typical" ranch in groups 1 and 2. Current Bureau policy requires a benefit/cost analysis of each allotment management plan before it is implemented. At that time, those projects would be eliminated that have no benefits to livestock operators and insufficient benefits to other resources such as wildlife, soils and watershed to make a cost-effective investment.

16-b. Intensive monitoring would not actually improve range condition but would provide a means of determining trend. Adequate budgeting would be essential in achieving any of the objectives established for the area.
May 15, 1981

O'dell Frandsen, district manager
Bureau of Land Management
940 Lincoln Road
Idaho Falls, Idaho 83401

Dear Mr. Frandsen:

I appreciate the opportunity to make comments on the Big Desert Grazing Draft Environmental Impact Statement. I believe this document is one of the more reasonable statements I have seen in the past few years. It only has 192 pages of material and I actually did read most of them.

Although I think the proposed action probably would be the best plan for the Unit, I don't think the additional cost generated would merit the additional costs of the proposed action or of alternative no. 3. I feel that alternative no. 1 is not realistic and alternative no. 2 is ridiculous.

Therefore, I support the basic considerations of alternative no. 4. There are, however, a few things I would question in the draft statement.

First, and most important to my operation, is the two to three week later turn-out date. In considering the sheep grazing allotment, I concede that native range is normally not range-ready on April 1 and April 15 or 20 is a more realistic turn-out time. However, the needed area within the allotment is usually range-ready about April 1-5.

I would hope that the final impact statement would distinguish between native range and needed area and stipulate that the needed area would be given an earlier turn-out date if grazing conditions warranted.

Second, it is most imperative that the 4800 acre halogenated re-habilitation project be completed as rapidly as possible. This area is not only a hazard to livestock grazing, but it is a disgrace to the basic principles of range management and the environment.

Third, I would like to see an allotment system established in the Big Desert sheep grazing allotment. Until an allotment is initiated, along with the normal grazing by ten, there can never be a decent distribution of animals and there will never be an improvement of range conditions.

Fourth, I am certainly not opposed to wildlife and the wildlife habitat. However, considering the complete impact statement, I feel that the wildlife considerations were over-rated and the cost-benefit ratio is about unrealistic and the basic concept in alternative No. 3, livestock grazing in the basic use of the area and the major consideration should be based upon this use.

I fully believe in the multiple use concept, but, in relation to the amount of wildlife in this area, I think the concern for most wildlife was overstated. Where, the poor coyote wasn't even mentioned. I can personally verify that the coyote is more than adequate in number and that the health condition of the coyote is excellent because of his well-chosen diet.

Sincerely,

[Signature]

Tom Ito, chief
Utrochein Ranch, Inc.
Box 76, Sterling, Mt.
Aberdeen, Idaho 8210

17-a. Chapter 3, page 40, paragraph 2 addresses range readiness, and the fact that crested wheatgrass seedings are ready for grazing about 5 days before native range.

17-b. Allotment management plans (AMPs) will be written in cooperation with livestock operators as soon as the EIS has been completed. An allotment system would be considered at that time.

STATE OF IDAHO
DEPARTMENT OF HEALTH AND WELFARE

DIVISION OF ENVIRONMENT

Pocatello, Idaho 83201

29 May 1981

Mr. O'dell Frandsen
Bureau of Land Management
940 Lincoln Road
Idaho Falls, Idaho 83401

Dear Mr. Frandsen:

Thank you for the opportunity to review the Big Desert Grazing draft E.I.S. The Big Lost River is the only major stream in the area. It is classified as a special resource water but is intermittent below Arco. The other information in the text concerning water quality and quantity appear to be accurate.

If you have any questions, please contact this office at 236-6168.

Sincerely,

Craig Higley
Senior Environmental Quality Specialist

CC: Henry Moran/Gordon Hopson

18-a. Addition to the text page 59, paragraph 5: The Big Lost River is classified as a special resource water but is intermittent below Arco.
28 May 1981

O'Dell Frandsen
Bureau of Land Management
940 Lincoln Road
Idaho Falls, Idaho 83401

Dear Mr. Frandsen:

On behalf of the Board of Directors of the Bonneville County Sportsmen's Association, the comments below pertain to the Big Desert Draft Environmental Impact Statement (E.I.S.):

Your office is to be complimented on a job well-done. The draft E.I.S. appears to be a comprehensive and thorough study and more "readable" than some we've seen.

Of the alternatives proposed in the E.I.S., we recommend adoption of ALTERNATIVE #4 for these reasons:

- Wildlife and related outdoor recreation will be significantly increased.
- Seeding of the Big Butte (which would affect its visual resources)
  isn't required.
- Less vegetative manipulation required - hence less adverse impacts will result.
- Based on the current Federal Administration, the likelihood of receiving funds to implement your proposed cost alternative is very small. Alternative #4 is only 1/3 as expensive, and hence a more attainable alternative.

There seems to be an error in the Table 2-9 (2-19?) on page 31ff. The recreational potentials in this table for alternative #4 are listed as decreasing. However, the discussion of these subjects on page 118, plus other related information, indicates they would increase. We assume the table is in error, and make our recommendations from the written discussion.

Thank you for the opportunity to comment. We know preparing such E.I.S. must be a horrendous chore. But we're also sure that in the long term the resource and the public will surely benefit.

Martin F. Huebner, Secretary

19-a. See response 2-a.
COMMENTS ON BIG DESERT GRAZING

DRAFT ENVIRONMENTAL IMPACT STATEMENT

It is our opinion that alternative 4 would be more advantageous than the proposed action. A comparison of the predicted 20 year gain in AUM's for the proposed action yields an increase of only 4% over that for alternative 4. This small increase in AUM's would occur at an additional cost of $1,103,600 over that for alternative 4.

Also alternative 4 would have less impact on wildlife since 32 miles of fence would be constructed as opposed to 83 miles of fence required for the proposed action. Since a sizable antelope population exists in the Big Desert unit, problems would be encountered with fencing of migration routes. The recommendation of constructing drop-wire fences is good. All fences should have a smooth bottom wire no less than 16 inches above the ground to allow antelope passage (see guidelines Appendix H). Also, the proposed land treatments in alternative 4 would be less harmful to wildlife than that outlined in the proposed action.

Over 34 thousand acres of the land in the Big Desert Area occur within the withdrawal lands for DOE's Idaho National Engineering Laboratory. Minimal comment is made within the DEIS on the type of habitat alterations planned for this area. Since the INEL lands are classified as the National Environmental Research Park, any proposed habitat alterations in this area should be discussed.

The concept of conducting vegetation manipulation projects in irregular patterns is good since this would create more edge in vegetative stands. However, of the possible land treatments, burning or chaining (chaining not discussed in document) would likely provide habitats mutually beneficial to wildlife and livestock. Neither treatment would result in a complete eradication of sagebrush, and a good forage cover could still be obtained. We support the burning and chaining projects. In contrast, spraying, spraying and seeding, and plowing and seeding are detrimental to wildlife populations.

Studies in our laboratory have shown the detrimental effects of plowing and seeding on sage grouse, antelope, all birds and small mammals. Minimal information is provided on the type of seed (only listed as "desirable species", "desirable plants") that are to be applied after the treatments. A more detailed description of the seed mixture should be provided. Any planned seedings containing crested wheatgrass as a dominate seed should be avoided because of its adverse effects on wildlife.

Problems occur with several statements made in the document regarding the affects of the several alternatives on wildlife; we can find no data to support many of these statements. Noted below are some examples:

1. Statement: (Page 76) - The overall impact of the proposed actions on antelope would be beneficial. With the increased water and expanded habitat, antelope numbers are expected to increase.
   (Page 52) - Data in table indicates proposed action will result in 100% increase in mule deer, antelope and sage grouse populations.
   Response: It may be naive to imply that by simply making water developments, we can double our wildlife population within 14 years. Surely, water is not the only critical factor affecting wildlife numbers. There is a complex interaction between necessary requirements such as vegetation, water and cover as well as other critical factors (reproductive success, etc.). Also as stated on page 48, vegetation diversity is the key to good antelope habitat.

2. Statement: (Page 53) - Ferruginous hawks nest on the ground.
20-a. Map 2-2 and 2-3 (map packet, back cover) present land treatment projects and their general locations. There is only one land treatment project proposed for the INEL, and it occurs under Alternative 3: a seeding on the AEC Riverfield allotment. Because the ecological sites found on this allotment are similar to the rest of the Big Desert Environmental Impact Statement area, we felt no need to address this project separately. Environmental impacts for various land treatments were addressed in general for the entire Big Desert EIS area.

20-b. The Big Desert EIS area is in a low precipitation zone (8-16 inches per year), and a good variety of seed is not available for drier areas. We are limited in the seed mixtures we can try. A seed mixture we have used is Siberian wheatgrass, small burnett, yellow blossom, sweet clover, Lodak alfalfa and Wyoming big sagebrush.

20-c. Water was considered to be the most limiting factor on wildlife populations on the Big Desert. See page 72.

20-d. BLM Technical Note, TN-316, 1978 by Mayo W. Call, page 46, indicates that ferruginous hawks nest on almost anything that gives some elevation above the surrounding area. In largely treeless areas, such as the Big Desert, they usually nest on the ground.

20-e. It is a well documented fact that sage grouse leks have short vegetation, and it has been assumed that this makes the displaying males more visible to the females. Recent data from INEL, (Connelly, J.W., W.J. Arthur and O.D. Markham, 1981, "Sage Grouse Leks on Recently Disturbed Sites," Journal of Range Management, Vol. 34(2), pp. 153-154), indicates that "...newly cleared sites for displaying areas may have potential as a management tool." This evaluation included a burned area.

20-f. The last sentence on page 11 should be dropped from the text.

20-g. The wildlife use and location maps and population estimates were developed from the best data available.
20-k. Add deer mice to the small animal list on page 51, paragraph 8. A complete listing is available at the Idaho Falls District Office.

20-l. See response 20-e.

20-h. See responses 2-c and 2-d.

20-i. See response 2-a.

20-j. Table 2-7 lists four sheep allotments: Big Desert, Huddles Hole, Moreland and Rock Corral. The other sheep allotment is the Kats Dance allotment which is recommended to be managed by the Idaho Department of Lands.
20-n. The results of the INEL studies on the INEL are mentioned on page 79 of the draft EIS. Areas of wildlife habitat adjacent to the water developments would be fenced to protect them from livestock grazing. This is a function of the wildlife program and was not covered in this EIS.

20-o. This plow and seed occurs under Alternative 3, Increased Livestock Use. Sites for this alternative were selected by using the natural potential. All sites would be looked at on-the-ground and coordinated with other agencies before implementation.

20-p. The fence shown on Map 2-3 and within the non-grazed area is in error and should not be there. It was our intention to have a buffer between grazed areas and the waste disposal site.

20-q. The impacts of the Proposed Action on mourning doves were determined to be insignificant. This is due to the extreme adaptability and mobility of the doves. The 1975 Progress Report on Idaho National Engineering Laboratory Site Radioecology-Ecology Programs on pages 52-57 indicates that wheat is just as important to doves as halogeton, and that doves will fly over 19 km to feeding areas. The proximity of wheat fields, the amount of wheat available, the movement of doves to feeding areas and the equal importance of halogeton and wheat as food, support the no significant impact determination. Therefore, controlling a relatively small acreage of halogeton would not seriously impact doves.
I suspect that there are some other subtle effects of plowing and seeding, but unfortunately there are no specific studies (to my knowledge) that would help. Plowing turns up the B horizons and brings a lot of calcium compounds to the surface. This would change the surface pH. Furthermore, plowing destroys the structure of the soil that has developed over years. This structure is very important in determining infiltration rates; one would predict that infiltration would be lower on seedings than on native areas. This is not so important a concern for irrigated agriculture, but could be critical on a desert.

Is there a reason why chaining and seeding could not be used rather than plowing and seeding, except on the areas where halogon control is needed? Chaining would reduce the "brush" cover, but would retain native seed reserves and soil structure. I would also support greater use of fire rather than spraying or plowing and seeding.

On page 18, it is stated that spraying is the only effective method for reducing threethip sage. Would not chaining be effective? Fire will also reduce its cover and vigor in relation to other species, despite its ability to spread.

The name of Alternative 4 (Grazing Reductions...) is a misnomer. That alternative does not result in grazing reductions, as I read the statement. Rather, it results in fewer projected additional AUMs in 20 years. The name should be changed so that it does not automatically bias a reader's view.

If the proposed action results in more AUMs in 20 years than alternative 3, despite the fact that another half million dollars would be required for alternative 3, it would seem that alternative 3 is not really a viable one. I suggest that the much more cost effective alternative 4 become the proposed action and that #3 be dropped.

With regard to productivity estimates (pages 41 and Appendix C), it is well known that in arid regions there are more years with below average precipitation than with above. Thus, "normal" is something less than average. I think that more substantiation of your correction based on 65 percent of normal is needed. Perhaps a few clipped plots from 1981 (or 1980?) could be used for comparison.

Also in relation to methods, it is stated that standard errors and confidence intervals were computed, but apparently nothing was done with them. All of the productivity estimates in the document are treated as point estimates with up to three significant figures (eg. 106 lbs/acre on page 136) with no indication of errors or confidence limits. I do not understand why anyone would put an alpha level of 0.2 (page 134); that implies you are willing to be wrong one time in five! In fact, if you have standard errors on the productivity estimates then you should be able to put confidence limits on the various AUMs. That should be done! Then you could get some impression of whether the current 43,441 was really below the carrying capacity. I will wager that that figure will be within a 95% confidence interval, which would imply that you do not have sufficient data to tell whether current use is below carrying capacity.
21-a. The statement that treated areas would move toward the natural potential plant community was not in reference to seedlings. It was in reference to spray and burn sites.

21-b. Refer to response 3-b.

21-c. Spraying would be the most cost-effective method for controlling these stands of threetip sagebrush. In the areas we are proposing to spray, there are many threetip seedlings and a reduced understory. Chaining works well on mature stands of sagebrush, but is not very effective on younger stands. Due to the reduced understory, these areas would be difficult to burn effectively.

21-d. In most cases, bluebunch wheatgrass and bitterbrush are the primary species that would be directly monitored. Other species are monitored indirectly in photo trend plots that would be established in each pasture. Allotment management plans will be written for each allotment. During their development, additional key species could be identified.

21-e. Grazing reductions refer to the initial stocking rate rather than the long-term forage production.

21-f. Adjusting vegetation production data to normal years production is very difficult. Determining a correction factor for adjusting production to a normal year is probably the weakest part of the inventory procedures. This is why we would continue to monitor each allotment for range condition, trend and utilization. We did go back and reclip several sites in 1980 on the Big Desert EIS area, keeping in mind that the spring of 1980 was well above average in precipitation. At this time, we plan on continuing these clip plot studies.

21-g. Low and high production values were calculated to give the variance from the mean production at an 80 percent confidence level. A standard error was added and subtracted from the mean production to give the low and high production. Standard error was calculated by:

\[ SE = \frac{SD}{\sqrt{N-1}} \cdot T \]

Where:

- \( SE \) = standard error
- \( N = \) number of samples
- \( SD = \) standard deviation
- \( T = T \) value at 80 percent confidence level for \( N-1 \)
Examples: AGCR-POOR for 6 samples

\[ \bar{x} = 335 \text{ lb/acre} \]

\[ SD = 164.43 \]

\[ SE = \frac{164.43 (1.476)}{\sqrt{5}} = 108.5 \]

Low = 226 lb/acre  High = 444 lb/acre

The low and high values were used on each allotment to determine where the allotment's carrying capacity occurred within these production ranges. This information is available at the Idaho Falls District Office.

21-h. Many of the allotments on the Big Desert EIS area are community allotments (more than one operator per allotment). Switching classes of livestock would be very difficult to organize under such conditions. There is a private sheep allotment and a private cattle allotment that are being considered for switching classes of livestock in some type of management scheme.

21-i. See response 20-k.

21-j. The current grazing preference is 65,217 AUMs. This preference should be restored by the year 2000. The 91,000 AUM projection assuming that our burns, seedings and management proposals produce expected results. Many of the 91,000 AUMs would not be available for livestock use because they would be allocated to wildlife and non-consumptives uses. We are aware that error exists in our inventory; this is why we plan to monitor each allotment.

Your suggestion for rounding off our production estimates will be taken into consideration. However, rounded numbers can be difficult to trace should the need arise.

21-k. The explanation for cover determinations can be found in Appendix C-2 beginning on page 135, paragraph 2. We were not implying that these were the exact cover figures. We were trying to demonstrate that cover will in most cases increase as range condition and trend improve.

21-l. See response 9-b.

21-m. Refer to response 20-b.
O'Dell A. Freuden
District Manager
Bureau of Land Management
Idaho Falls District
940 Lincoln Road
Idaho Falls, Idaho 83401

May 27, 1991

Dear Mr. Freuden:

The Idaho State Clearinghouse has completed its review on the BIG DESERT
GRAZING DRAFT ENVIRONMENTAL IMPACT STATEMENT - SAI F0551524. The
following agencies were contacted for their review and comment:

Region IV Development Association
East Central Idaho Planning and Development Association
Southeast Idaho Council of Governments
Division of Economic and Community Affairs
Department of Fish and Game
Department of Parks and Recreation
Department of Water Resources
Department of Lands
Idaho Historical Society
Office of Energy
Department of Health and Welfare/Division of Environment

At the time of sign-off, comments have not been received from the reviewing
agencies. All late comments will be forwarded to your agency.

Thank you for the opportunity to assist you in the review of your Draft
Environmental Impact Statement. Please send us a copy of your Final
Environmental Impact Statement. If you have any questions, do not hesitate
to contact myself or Lois Wade at (208) 334-8718.

Sincerely,

Gloria Rahn, Coordinator
Idaho State Clearinghouse

[May 27, 1991]

-9-

Bureau of Land Management
Idaho Falls

May 29, 1991

Comments by Glenn A. Redick - April 19, 1991

I agree that the draft environmental impact statement does not say that the land is suitable for
stays above the same, or all, purposes in the George Apperson #21, with the land in
agreement. 10 years ago work was done to obtain the land in good condition, 2 years ago
we had the opportunity to go to the land with the owner. 4 years ago I had the opportunity to
the amount of spring rain

15 if the range survey is made immediately after
10 a year with winter and snow and thin deep

5. I also agree that you can take a vegetative survey

8 years ago and say this is it. Every year that

10 have not seen the big years from the year before

10 that things do not happen in a section of the

10 are not considered.

10 and demonstrate the amount of vegetation

10 I do agree that there are cases that need

10 I think that the we are

10 I think that some sound should be provided for

10 I think that some

10 and I agree to

10 not the number of

10 bottom number to count over what they use.

10 that all those who can approve

10 any reason should help pay for it and not
23-a. It has been taken into account that the survey was conducted in a dry year. This information is presented in Appendix C-1, page 134, paragraph 4.

23-b. The animals would increase naturally if the habitat is available; these figures are merely predictions of what could occur.

23-c. It has been determined through phenological data and past history of use, that May 1 is a better average turn-out date than April 16. We will continue to be flexible on this new turn-out date, depending on forage condition, as we have been in the past.

O'dell Frandsen
Bureau of Land Management
940 Lincoln Road
Idaho Falls, Idaho 83401

Dear Mr. Frandsen:

After reviewing the Big Desert Grazing Draft environmental impact statement, The Southeastern Idaho Rod and Gun Club can support only Alternative # 4 because:

1. Vegetation manipulation is limited to burning. We believe that spraying is detrimental to wildlife and to plant diversity.
2. The reason that the range is in poor condition is that they graze it too heavily now and in the past and reductions are needed.
3. The other alternatives have too many fences.
4. The other alternatives have too many roads and pipeline spring type developments.
5. The cost to the taxpayer is not excessive as the other plans are.
6. This plan is most compatible to multiple use without excessive detriments to any phase of use.

Sincerely,

Karl E. Holte, Ph D
President.
28 May 81

Mr. Odell Frandsen
Bureau of Land Management
940 Lincoln Road
Idaho Falls, Idaho 83401

Dear Mr. Frandsen:

I have reviewed the Big Desert Grazing Draft Environmental Impact Statement. I support alternative #4 because:

1. No development should be done at all on Big Southern Butte.
2. No spraying is included.
3. Fence building is at a minimum.
4. The cost to the taxpayer is minimal.
5. Cattle and sheep grazing is in balance with the production ability of the range.
6. Recreation and other enjoyments can be accomplished with livestock use in the alternative.
7. I believe in multiple use and this is the only alternative which reflects true multiple use.

Sincerely,

Karl E. Holte, PhD

19 May 81
432 S. 11th
Pocatello, Idaho 83201

Mr. Odell Frandsen
Bureau of Land Management
940 Lincoln Road
Idaho Falls, Idaho 83401

Dear Mr. Frandsen:

I support Alternative #4 in the Big Desert Grazing Draft Environmental Impact Statement. The others involve too much destructive activity to wildlife and the environment and are too expensive to the taxpayer. The livestock industry must also take the bullet as the rest of us in this time of cut back.

In the others, I oppose the fences which are expensive and also damage free access to wildlife; in addition, I also oppose the spring development and pipelines. Nothing should be done on Big Southern Butte in the way of development. No spraying should ever even be considered as we stopped it on our enemies in Viet Nam—why should we use it here on our own??

Sincerely in the interest of a better integrity of government and environment,

R. D. Smith
May 29, 1981

Goddard Bar 13 Ranch
Star Route
Mackay, Idaho 83251

Bureau of Land Management
940 Lincoln Rd.
Idaho Falls, Idaho 83401

Dear Sirs:

The Purpose of this letter is to protest the proposed grazing cuts on Cox's Well Allotment in the Big Desert Management Area.

We feel the method used to inventory range condition did not fairly or adequately evaluate available forage. We are therefore filing this protest with the BLM and are asking for another review or evaluation or whatever process outlined in EIS guidelines.

Sincerely,

Jack Goddard

May 28, 1981

Mr. O'dell Frandsen
U.S. Bureau of Land Management
940 Lincoln Road
Idaho Falls, ID 83401

Dear O'dell:

Our Department has reviewed the “Big Desert Grazing Draft Environmental Impact Statement” and recommend that Alternative 4 be adopted rather than the Proposed Action, for the following reasons.

1. Alternative 4 is much more cost-effective than the proposed action, under which the BLM intends to spend $1.7 million to produce 91,685 AUM's, while alternative 4 would cost $650,000 for 89,930 AUM's. This would be an extra $1.1 million to increase production by only 3 percent (1,755 AUM's) over alternative 4. A cost of over $600/AUM appears excessive and needs more justification than is described in the document.

2. Alternative 4 would not allow increased erosion on any allotments, while the proposed action would increase erosion on four allotments.

3. Alternative 4 has only 32 miles of new fence, while the proposed action has 82.5 miles. Since this is an extremely important antelope migration route, additional fences have the potential to block migration corridors, especially in deep snow years.

4. Alternative 4 proposes 4,800 acres of mechanical brush control and seeding, while the proposed action would involve 18,000 acres. Since many of these projects are on antelope winter range, we feel they would be quite detrimental to antelope. Alternative 4 would also reduce the undesirable effects of mechanical brush control on antelope summer areas. We agree that the 4,800 acres along the stock driveway need to be plowed and seeded with a multi-species planting.

5. Alternative 4 would result in much less human disturbance in the area (road building, fence construction, well drilling, waterline and trough installation, mechanical brush control and maintenance of all these projects).

Sincerely,

Jack Goddard
Additional comments specifically directed at the document contents are as follows:

We find it very difficult to understand how some of the conclusions in the EIS were reached. On pages 32 and 33 it states the proposed action will increase antelope, mule deer and sage grouse populations by 100 percent and hunter days will increase by 50 percent. It goes on to state that alternative 4 will increase deer and antelope populations by 39 percent and sage grouse populations by 11 percent, but that hunter days will decrease by 40 percent. It just is not logical that hunter days would decrease with an increasing wildlife population.

Page 96, Alternative 2, No Grazing, D. Wildlife: This proposes that 5,000 acres receive herbicide treatment. This would adversely affect antelope habitat by reducing sagebrush and forbs. A recommended alternative should be for a controlled burn or no treatment.

There are omissions of antelope winter ranges on Map 3-4. One of these is along the Big Lost River in the Riverfield Allotment. We do not have precise data about the extent of the wintering area because census flights on the Big Desert have been extremely limited. We feel the antelope population estimates in the EIS are low, but do not have any good data for reliable estimates.

We oppose the development of Webb Spring. There just is not enough water there to feed three troughs and still leave water for wildlife. Webb Spring is the major source of water for mule deer and many other species on Big Butte. We recommend that water in all troughs be managed by BLM personnel. If it is up to the ranchers they will turn it off when their stock leaves, drying up the water source for wildlife in the middle of the summer. This has been a chronic problem all over the region.

General Comments

There is a tendency throughout the statement to infer that good livestock management requires livestock use every square foot of the area. Areas unused by livestock or forage left untouched by livestock is judged to be an unsatisfactory situation. Some areas "recently unused by livestock due to a lack of water are being programmed for livestock water developments. Ungrazed areas are valuable as wildlife sanctuaries and should continue to be managed as such.

We do not understand how the BLM determined that the proposed action will increase wildlife populations more than alternative 4. We do not see how they reached this conclusion. We feel strongly that the proposed action is far more detrimental to wildlife than is alternative 4.

We appreciate the opportunity to comment on this document and request our comments be considered when the Proposed Action is adopted.

Sincerely,

cc: Region 5
Region 6
Clearinghouse SAI#00515824

28-b. See response 21-c.

28-c. Additional problems between livestock and wildlife are addressed on page 97 under beneficial and adverse impacts of this alternative. Water developments could be developed for wildlife even if there were no grazing by livestock. This would be accomplished by the wildlife program and is not covered under this grazing EIS.

28-d. See response 28-c.

28-e. See page 98, paragraphs 3 and 4.

28-f. See response 20-g.

28-g. See response 4-a.

28-h. The Big Desert EIS area will always have areas that are unused by livestock. Good livestock distribution is important in order to improve range condition and trend and to maintain rangelands at these higher condition levels. If rangelands are in better condition, both wildlife and livestock should benefit.

28-i. See response 2-d.

28-j. See response 28-c.

29-a. Chapter 2, page 4, Table 2-1 - What specific intensive range management activities are to be implemented on the INEL withdraw lands?

29-b. Chapter 2, page 5, Objectives - Your objective is to reduce the disturbed area from 19% to 2% within 20 years - the disturbed area is described as "burned". If you are planning some controlled burns and will obviously still have some wildfires, is this possible?

Perhaps, if our interpretation of disturbed is correct, your goal should not be to reduce the disturbed percentage but should concentrate on improving that potentially productive rangeland in fair ecological condition? Are the burned areas all in poor ecological condition?

29-c. Chapter 2, page 17, Reservoir Development - Any reservoirs which are sealed would probably require fencing to protect the seal.

29-d. Chapter 2, page 18, Land Treatments, 1st paragraph, 3rd sentence - Any seedbed preparation planned on the 7800 acres? What success percentage would you expect on that acreage?

29-e. Chapter 2, page 20, Monitoring Program, 2nd paragraph, 1st sentence - Sentence two and three are not possible if studies are conducted only at end of grazing season. To get a good picture of what is going on utilization studies should be taken during the grazing period.
Many burn areas could be considered in poor ecological condition because in most cases they would be lacking some of the main components of the potential vegetation community.

29-c. The 7,800 acres are dominated by annual vegetation, and no seed bed preparation was proposed. A rangeland drill would be used to introduce a perennial seed source. The success of this type of seeding would depend on the amount of precipitation.

29-d. When Map 3-1 (vegetation types) is compared to Map 2-3 (proposed projects and treatments, Proposed Action and Alternative 3), the proposed spray projects do occur on threetip sagebrush sites (Artr4).

29-e. Chapter 2, page 20, paragraph 2, sentence 1 reads: "Utilization studies would be conducted during or at the end of the grazing season on use patterns."

29-f. Refer to response 21-d.
while livestock and farm income has declined up to 56% within the same time frame. It does state however, that total regional employment was 31,209 in 1978 of which agriculture was the largest employer. We encourage the BLM to re-examine this income information which implies that livestock and farm income are less significant than non-farm incomes. However, it does not consider that many non-farm industries heavily depend upon livestock and agriculture for their existence. Idaho’s total economy and the regional economy of the Big Desert is based primarily upon agriculture. Without it other industries would be drastically reduced.

The cattle industry in Idaho produced over $660 million gross income to the State of Idaho in 1980. BLM statistics show that approximately 52.5% of Idaho’s cattle graze on BLM lands sometime during each grazing season. Approximately 340,000 cows graze on BLM lands each year. On an average Idaho calf crop, approximately $153 million gross income is generated directly into the state’s economy each year from the cattle industry. By using a multiplier of 9, which is the generally accepted figure used by range economist, the cattle industry on BLM lands in Idaho produces approximately $1.377 billion dollars annual gross income to Idaho’s economy through income generated by the cattle industry.

The EIS also contains proposed action which would reduce livestock grazing from 10% to 20% below the 5 year average use in the Big Desert Area while proposing to increase the allocation of forage for deer and antelope by over 100%. We believe that this proposed action conflicts with past multiple-use management procedures in the area. We urge the BLM to revise this proposed action to at least establish grazing levels at the five year average use or above, yet still allow viable deer and antelope herds. The level of non-use which has been exercised in this region illustrates that
The livestock producers have apparently been cooperating on management of the rangelands. The proposed action should also reflect this cooperation.

Table 4-10 on page 84 shows that the cattle AUMs would be decreased from active preference by an average of 16% or approximately 5,000 AUMs. On the other hand, the sheep numbers have been maintained at the active preference which is actually above the average 5 year use. We encourage the BLM to reassess these reductions of cattle numbers from 10% to 20% while increasing the allotment for deer and antelope by 100%. The cattle industry in this area deserves equitable consideration in resource allocation.

We believe that multiple use can be obtained without making the cattle industry sacrifice for the benefit of recreationalists who generally do not pay for the use of the land or help maintain fences, water facilities or forage quality. Through proper management, along with the proposed range improvement plans outlined in the EIS, we believe that livestock numbers could at least be maintained at current levels.

On page 13, proposed range improvements totalling $1,157,200 are proposed for the Big Desert Region. However, it does mention that these range improvements are subject to available funding levels. We encourage the BLM to implement cooperative range improvement programs with permittees to provide continuity to these programs and save money where funding might be a problem.

In summary, we emphasize the importance of the livestock industry to the economy of this area. This factor along with balanced multiple-use management which does not sacrifice the livestock industry or wildlife should be written into this EIS. We stress that this EIS over emphasizes the importance of recreation and wildlife and under estimates the importance of the livestock industry in the Big Desert Region. We encourage the Bureau to make positive changes to correct this inadequacy in the final EIS. We appreciate your consideration of our comments.

Sincerely,

Mike Mogenese
Executive Vice President

cc: Idaho Congressional Delegation
Bob Swanson, President, ICA

30-a. On page 56, we said that farm income accounted for 15 percent of the total regional income. This makes the farm sector the third most important in the region behind services and government. A portion of the income generated on these industries results from activity in the farm/livestock industry. The livestock multiplier used on this EIS was 1.22. This means that for every dollar of income generated in the livestock industry, an additional 22 cents of income is generated elsewhere in the economy (largely services and retail trade).

30-b. The Proposed Action would result in a 27 percent increase in livestock use from the 5-year actual use, not a 10-20 percent decrease. We are proposing to increase forage for both livestock and wildlife. The 100 percent increase in deer and antelope numbers is only a projection. Because deer and antelope diets consist primarily of brush and forb species, their numbers could increase substantially with vegetation presently in the Big Desert EIS area with additional water developments.
Jerry Jayne - Idaho Environmental Council

31-a. I was surprised to see that the present net worth before the Proposed Action was higher than for Alternative 4 which just doesn't figure.

Response: The net present worth of the Proposed Action is higher than that for Alternative 4 primarily due to range improvement construction and maintenance. It was estimated that under the Proposed Action $326,000 would be spent locally for range improvement construction. Annual maintenance would bring $16,000 per year into the local economy. Under Alternative 4 there would be $120,000 spent on construction and $6,200 annually on maintenance of range improvements in the local economy.

31-b. I think to make a rigid comparison of the economic aspects of each alternative, one has to figure the true costs and the true benefits relative to the taxpayers and the Nation as a whole and not just to the region.

Response: The net present worth calculations done for this EIS were intended to portray the relative impacts on the local economy of the alternatives. It is not a comprehensive benefit/cost analysis which considers all social costs and benefits. This type of analysis will however be accomplished at the allotment management plan level.

Jeff Siddoway - Idaho Woolgrowers Association

32-a. I think there are some benefits of the Proposed Action that perhaps haven't been counted in the EIS: Not only the increased AUMs but the gains in the management benefits of less work and where a manager's time could be better spent. That perhaps increases the efficiency and output of an overall operation.

Response: The benefits of less work and better use of the manager's time are highly variable, depending on factors such as the individual's managerial ability. It is not possible for the Bureau to estimate these types of benefits.
ERRATA SHEET

Changes and additions to the draft EIS text in addition to those listed below are referenced in comment responses 1-a, 18-a, 20-f, 20-k, 20-m and 20-p.

Page 9

Table 2-3 Summary of Proposed Action and Alternatives Section 3

Change burn acres, Proposed Action column to 55,000.

Page 23

Table 2-13 Proposed and Existing Use, Alternative 3, Increased Livestock Use

Place an asterisk (*) after 43,641 AUMs.

Page 33

Table 2-9 Comparative Analysis of Impacts

In the recreation section, Alternative 4 column, change 40 percent and 10 percent decrease to 40 percent and 10 percent increase.