Ellis-Pahsimeroi, Final Grazing Environmental Impact Statement

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

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Dear Reader:

Enclosed for your review is the Final Ellis-Pahsimeroi Grazing Environmental Impact Statement. This statement was prepared by the Bureau of Land Management pursuant 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 proposed grazing management on 380,458 acres of public land in Central Idaho. Five alternatives to the proposal are also considered.

This statement does not include an entire reprint of the draft statement. Instead, this statement includes only those changes that are necessary to the Draft EIS, the public comments, and responses to the public comments received on the Draft EIS.

This document, used with the draft statement, which was distributed to the public on February 3, 1982, constitutes the Final Environmental Impact Statement.

This final statement is not a decision document; it merely analyzes the probable impacts to the human environment that the proposed action and alternatives would create. The decision on the action to be taken will be based on the analysis contained in the Final EIS, BLM’s man power and budget constraints, public concerns and comments, and other multiple-use resource objectives or programs for the area. Decisions cannot be enacted before 30 days following the filing of the final statement with the Environmental Protection Agency and distribution to the public. A summary document that outlines the management direction for the Ellis-Pahsimeroi area will be prepared and made available as soon as a decision is reached; tentatively late 1982. More specific decisions will subsequently be developed on an allotment-by-allotment basis.

Sincerely yours,

Jerry Goodman
District Manager, Acting
PROPOSED RANGE MANAGEMENT PROGRAM
FOR THE
ELLIS-PAHSIMEROI AREA

DEPARTMENT OF THE INTERIOR
BUREAU OF LAND MANAGEMENT

Clair Whitlock, IDAHO BLM STATE DIRECTOR

1. Type of Action: (x) Administration
   ( ) Legislative

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

3. Abstract: The Ellis-Pahsimeroi Grazing Environmental Impact Statement
   analyzes the effects of livestock grazing on 380,458 acres of public
   land in central Idaho. Six grazing management alternatives are
   presented for consideration and are analyzed in terms of their
   projected economic, social and environmental effects. Each
   alternative analyzes a different level of allocating the vegetative
   resource among competing uses.

   This document will be used to determine the proper level of
   livestock grazing on the public lands, using the multiple use
   sustained-yield concept. Its contents exemplify the conflicting
   demands being placed on public lands throughout the West and the
   concessions necessary to achieve parity between resource needs and
   resource use. The range land management program selected for the
   Ellis-Pahsimeroi area will be based upon the analysis presented in
   this document.

4. Comments Have Been Requested and Received From:
   See page 9 for listing of persons and/or agencies commenting.

5. Date Draft Statement Made Available to EPA and the Public:
   Draft: February 3, 1982
Public Review of the Statement

There will be copies of this final environmental impact statement available for review at the following places.

Challis City Library
Challis, ID 83226

Custer County Agricultural Agent
Box 160
Challis, ID 83226

Salmon Public Library
Box 897
Salmon, ID 83467

Lenihi County Agricultural Agent
Box A
Salmon, ID 83467

Soil Conservation Service
Box 550
Salmon, ID 83467

BLM Offices
State Office
550 W. Fort Street
Boise, ID 83724

Coeur d'Alene District
Box 1889
Coeur d'Alene, ID 83814

Shoshone District
Box 2B
Shoshone, ID 83352

Boise District
230 Collins Road
Boise, ID 83702

Burley District
200 South Oakley Highway
Burley, ID 83318

Idaho Falls District
940 Lincoln Road
Idaho Falls, ID 83401

Salmon District
Box 430
Salmon, ID 83467

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When the Draft EIS was printed, the Proposed Action was the "Preferred Alternative". However, after consideration of the environmental impacts, costs, benefits and public comment the Proposed Action is no longer the "Preferred Alternative". Alternative 4 is now considered the "Preferred Alternative".

Forage allocation would be based on condition and trend data. The inventory data would be used as a baseline when condition and trend data indicate there is a need for adjustments. The following is a detailed description of Alternative 4.

Alternative 4 Maximizing Range Improvement Benefits

Under this alternative, initially, forage allocation would follow present stocking rates except on 7 of the 11 allotments identified below for intensive management. Those 3 allotments given increases under the Proposed Action would be allowed the same increases under this alternative. Initial stocking rate would be 27,435 AUMs.

Improvements as indicated in the Proposed Action involving vegetation manipulation, water developments, fencing and grazing systems would be scheduled for only those allotments in the intensive management category. These improvements would be on a five year time frame. Approximately nine other allotments would have these types of improvements implemented over 20 years as proposed in Alternative 1 - No Change. Selection of these nine allotments would be according to the BLM range management policy involving selective allotment management.

Four allotments, Camp Creek, Second Creek, Iron Creek, and Burnt Creek have issues identified concerning preference versus production and actual use versus licensed use. These problems would have a priority for being resolved. Well defined monitoring programs would be initiated on these four allotments to verify actual use, condition, and trend. At the end of five years these allotments would be stocked at their true carrying capacity. Burnt Creek riparian zone would be fenced.

Allotments were placed in the intensive management category if they possessed one or more of the following characteristics:

1) If 36 percent or more of allotment acreage was in poor condition regardless of trend;
2) If 10-35 percent of allotment acreage was in poor condition and in a downward trend;
3) If the allotment had a seeding from which AUMs were derived.

<table>
<thead>
<tr>
<th>Allotment</th>
<th>Initial Stocking Rate (AUMs)</th>
<th>Present Stocking Rate</th>
</tr>
</thead>
<tbody>
<tr>
<td>1) Findley Basin</td>
<td>44</td>
<td>66</td>
</tr>
<tr>
<td>2) Allison Creek</td>
<td>403</td>
<td>655</td>
</tr>
<tr>
<td>3) Hat Creek</td>
<td>1366</td>
<td>1654</td>
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<tr>
<td>4) Falls Creek</td>
<td>545</td>
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<tr>
<td>5) Hamilton Seeding</td>
<td>60</td>
<td>70</td>
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<tr>
<td>6) Mahogany Creek</td>
<td>59</td>
<td>172</td>
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<tr>
<td>7) Patterson Creek</td>
<td>120</td>
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<tr>
<td>8) County Line</td>
<td>496</td>
<td>680</td>
</tr>
<tr>
<td>9) Lower Goldberg</td>
<td>196</td>
<td>196</td>
</tr>
<tr>
<td>10) Big Creek *</td>
<td>370</td>
<td>396</td>
</tr>
<tr>
<td>11) Bear Creek</td>
<td>1301</td>
<td>1301</td>
</tr>
</tbody>
</table>

*These two were placed here because of their seedings. Other of the 11 allotments also have seedings from which AUMs were derived. However, these other allotments fell into the intensive management category either because of characteristic 1 or 2 above. The investment of a seeding necessitates that intensive management be practiced to assure the seeding's continued production.

Note: Standard Operating Procedures, Project Development and Design, Criteria, Monitoring Programs, Administration Procedures, Implementation Schedule and Conversions of kind of livestock as identified in the Proposed Action would be followed. (See pp. 2-8 through 2-14 of DEIS)
This Ellis - Pahsimeroi Grazing Environmental Impact Statement (EIS) analyzes the effects of livestock grazing on 380,458 acres of public land administered by the Bureau of Land Management, Salmon District, in central Idaho.

The EIS is being prepared between the recommendation and decision phases of the Salmon District's land-use planning process. That process has included detailed resource inventories, individual resource development plans, conflict analysis and multiple use recommendations. This EIS serves as an analytic instrument which will be used in deciding a course of action affecting the range land. The decision evolving from this study will determine final vegetation allocations among livestock, wildlife and non-consumptive uses such as watershed.

Issues and Controversy

The general public, special interest groups, other federal agencies and state agencies were consulted at regular intervals throughout the planning and EIS scoping process. In general, contributions from individuals and agencies were low level, except for ranching groups which expressed the most interest and made the most contributions of any of the groups. As a result of this consultation, the principal conflict related to livestock grazing surfaced as economic effects on ranchers versus allocation of forage.

The identification of these issues enabled the formulation of alternatives to be analyzed in the EIS. The basic difference between the Proposed Action and the various Alternatives lies in the number of AUMs allocated to livestock and wildlife and the extent and time frame of the range improvement program.

The major area of controversy centers around the initial adjustments in livestock AUMs to meet the determined available forage production for livestock.

Consequences of Proposed Action and Alternatives

The Proposed Action calls for an initial reduction of 4.6 percent from the current active grazing preference (from 27,979 AUMs to 26,689 AUMs). This would result in decreases in livestock allocations on 12 allotments, increases on 3 allotments, and an unchanged situation on 18 allotments. Wildlife would be allocated 2,751 AUMs and non-consumptive uses would receive 193,609 AUMs.

The Proposed Action also plans for 85 miles of pipeline, 89 troughs, 30 reservoirs, 69 miles of fence, 10,820 acres of new vegetation manipulation, 2,460 acres of vegetation manipulation maintenance, and implementation of grazing systems on 25 of the 33 allotments.

Within 20 years, a 22 percent increase in forage production would allow an increase in the livestock allocation to reach 35,016 AUMs and an average increase in big game wildlife populations of 42 percent over the current situation.
There are currently no allotments where watershed conditions are deteriorating. However, reductions in livestock grazing would cause improvement on 42 percent of the area and maintenance of condition on 58 percent of the area. In addition, aquatic wildlife populations would benefit, cultural resources would receive a 67 percent increase in trampling effects, more pressure, and visual resources would not be affected significantly. Although negatively impacted initially, at the end of 20 years the economic and social conditions would have improved over the current situation.

Other management options are available including Alternative 1 (No Change), Alternative 2 (Prolonged Change), Alternative 3 (No Livestock Grazing), Alternative 4 (Maximizing Range Improvement Benefits) and Alternative 5 (Reduced Livestock).

Alternative 1 would result in a continuance of the present range program at the present rate. Livestock forage allocation would remain at 27,979 AUMs. The implementation of new grazing systems and range improvement projects would result in an expected 3 percent increase in forage production over the long-term. This would result in 28,818 AUMs available for livestock and recreational use. Cultural resources would receive cuts, the three allotments identified in the Proposed Action for increases would receive increases, all remaining allotments would remain stocked at their present rate. Economic and social impacts would be greatest under this alternative. Watershed conditions would improve on 42 percent of the area with maintenance of present conditions on 58 percent of the area. Cultural resources would incur 45 percent increase in trampling effects. Visual impacts would not be significantly affected. Long-term, recreational use would be affected the same as in the Proposed Action. Aquatic wildlife would benefit the same as in the Proposed Action.

Alternative 2 involves basically the same programs as the Proposed Action, only over a 20 year time frame of implementation instead of the 5 year time frame of the Proposed Action. Livestock allocations would not be changed from the current number. However, a 14 percent increase in forage production would allow for a corresponding increase in livestock AUMs and the same number of big game wildlife populations as Alternative 1 (No Change). Watershed and range improvements, cultural resources, visual resources, and recreation, would be affected as in the Proposed Action. Big game wildlife populations and aquatic wildlife would incur increases the same as under the No Change Alternative. No change would occur initially in the economic conditions of the rancher groups affected. However, over the long-term, rancher income would increase resulting in the same long-term gains as the 5 year Proposed Action. Since reductions would not occur but economic long-term gains would be made, social well being would be better than the Proposed Action.

Alternative 3, although not a realistic alternative, is a requirement of NEPA. Without livestock grazing, a long-term 45-90 percent increase in production would result. Wildlife populations would respond by increasing an average of 43 percent and watershed conditions would improve on 80 percent of the area with no change on 20 percent of the area. Under this alternative as compared to other alternatives, aquatic wildlife would have the greatest benefit, the effects of livestock trampling on cultural resources would cease along with any related visual impacts. Recreation opportunities would be greatest under this alternative. Economic and social conditions would be drastically affected.

Alternative 4 is designed to concentrate vegetative manipulations and range improvements where the potential economic return is the greatest. Initial stocking rates would be 27,435 AUMs allocated for livestock grazing. Seven of the eleven allotments identified for intensive management would receive cuts, the three allotments identified in the Proposed Action for increases would receive increases, all remaining allotments would remain stocked at their present rate. Economic and social impacts would be similar to the Proposed Action, long-term economic status and social well being would be improved above Alternative 1 and 5 but would be less than the remaining alternatives.

Alternative 5 reduces the initial livestock allocation to 22,778 AUMs (a 19 percent reduction from current active preference). Wildlife would be allocated 2,751 AUMs. After 20 years the expected production increase would be 26 percent. The same number of range improvements would be implemented as in the Proposed Action. Big game wildlife populations and aquatic wildlife would be affected the same as in the Proposed Action. Watershed condition would improve on 43 percent of the area with maintenance of present conditions on 57 percent of the area. Cultural resources, visual resources, and recreation would be affected the same as in the Proposed Action. Economic status and social well being would be negatively affected the most of all the alternatives except Alternative 3. Long-term conditions would increase but not to the extent of the other alternatives (with the exception of Alternative 1 and 3).

As can be seen from the above discussion, the long-term effects of many of the Alternatives are not widely dissimilar (with the exception of Alternative 3). This is a reflection of the low magnitude of problems in the EIS area. The final course of action will mainly affect the initial and long-term economic impact on the ranching groups and the time frame within which improvement in the range resource will occur.

OTHER CONSIDERATIONS

Since printing of the DEIS, a land exchange was completed with the State of Idaho. AUMs will be changed on an allotment by allotment basis according to existing allocations made by the State of Idaho.
A 60 day public comment period (January 29 through March 29, 1982) was provided on the Draft EIS to allow public review and comment. Approximately 300 copies of the Draft EIS were mailed to individuals, Federal, state, and local government agencies and to non-government organizations.

Notice of its availability was published in the Federal Register on February 8, 1982. In addition to the Federal Register notice, a Statewide press release was issued from the BLM Idaho State Office. This news release was sent to approximately 85 statewide and regional television and radio stations and newspapers. The Federal Register and news releases also gave the date and place for the public hearing that was held on April 9, 1982 at the Salmon Public Library in Salmon, Idaho.

During the review period, 28 letters were received from Federal, state and local agencies; private organizations and interested citizens. Twelve individuals gave oral testimony at the public hearings. Four letters were received after the comment period. These four letters were evaluated for substantive comments but did not present new data. They are included in the official files at the Salmon District Office. A hearings officer presided over the hearings and testimony was taped. From the tapes, verbatim transcripts were prepared. The Pahsimeroi Area Manager and the EIS Core Team comprised the BLM panel at the hearing. A copy of the comments made at the hearing is shown under the Comments and Responses section of this document.

All letters and public hearing comments were reviewed and considered in the preparation of the Final EIS. Table 1 in the Comments and Responses section lists the letters that were received and the individuals who gave oral testimony at the public hearing.

Although all public input will be considered when management decisions for the Pahsimeroi Resource Area are made, only comments that presented new data, questioned the adequacy of the impact analysis and raised questions or issues bearing directly upon the Draft EIS were responded to in this Final EIS. The Text Change section indicates how the Draft EIS was changed to respond to these comments where necessary.

Response to Letters

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

Response to Public Hearing Testimony

As with each letter, the transcripts of the public comments is printed. Each comment requiring a response is numbered. The response to each comment follows the transcript.
TABLE 1
RESPONSES TO DRAFT EIS

<table>
<thead>
<tr>
<th>Comment Letters</th>
<th>Representing</th>
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<tbody>
<tr>
<td>Number</td>
<td>Person</td>
</tr>
<tr>
<td>1</td>
<td>Robert Loucks</td>
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<tr>
<td>2</td>
<td>Neil Rimby</td>
</tr>
<tr>
<td>3</td>
<td>Lee Stokes, Ph.D.</td>
</tr>
<tr>
<td>4</td>
<td>Syd Dowton, Sr.</td>
</tr>
<tr>
<td>5</td>
<td>Kenneth Sanders</td>
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<tr>
<td>6</td>
<td>Joe Higbee</td>
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<tr>
<td>7</td>
<td>L. Edwin Coate</td>
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<tr>
<td>8</td>
<td>Ralph Hutchison</td>
</tr>
<tr>
<td>9</td>
<td>Randy Capps</td>
</tr>
<tr>
<td>10</td>
<td>Gloria Mabbutt</td>
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<td>11</td>
<td>Jimmie Dowcon</td>
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<tr>
<td>12</td>
<td>Andrew Apple</td>
</tr>
<tr>
<td>13</td>
<td>Amos Garrison, Jr.</td>
</tr>
<tr>
<td>14</td>
<td>J. Ratzloff</td>
</tr>
<tr>
<td>15</td>
<td>Richard winters</td>
</tr>
<tr>
<td>16</td>
<td>Eugene Hussey</td>
</tr>
<tr>
<td>17</td>
<td>Mike Overaker, Jr.</td>
</tr>
<tr>
<td>18</td>
<td>E.L. Latimer</td>
</tr>
<tr>
<td>19</td>
<td>Vaughn Higbee</td>
</tr>
<tr>
<td>20</td>
<td>Bob &amp; Leona Gibbs</td>
</tr>
<tr>
<td>21</td>
<td>Clyde &amp; Jan Phillips</td>
</tr>
<tr>
<td>22</td>
<td>Robert Salter</td>
</tr>
<tr>
<td>23</td>
<td>Thomas Green</td>
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<tr>
<td>24</td>
<td>Ken White</td>
</tr>
<tr>
<td>25</td>
<td>Hubert &amp; Lorraine Miller</td>
</tr>
<tr>
<td>26</td>
<td>Elizabeth Hutchison</td>
</tr>
<tr>
<td>27</td>
<td>Randy Capps</td>
</tr>
<tr>
<td>28</td>
<td>J. Rex Tolman</td>
</tr>
</tbody>
</table>

Late Letters in Salmon District Files

| Sydney Dowton, Jr. | Self |
| Roy Ellis | Self |
| James Hawkins | Custer County Extension Service |
| L.A. Mehrhoff | Fish and Wildlife Service |

Hearing Speakers

| Bob Loucks | Self |
| Eugene Hussey | Self |
| Richard McDaniel | Self |
| Martin Capps | Self |
| Dennis Trumble | Self |
| Rex Tolman | Self |
| Roy Ellis | Self |
| Jimmie Dowton | Lawson Creek Cattle Association |
| Don Grayot | Self |
| Ken White | Self |
| Bill Sager | Lemhi Cattlemen's Association |
| Mike Overaker | Lemhi County Cattle & Horse Growers Association |

Overview of Public Comments

1. Numerous public comments disagreed with the adequacy of the range inventory. These people felt that inventory data should not be used to allocate forage. The main problem arises when the inventory indicated certain allotments did not have adequate forage to support existing allocations, yet the allotments were in fair or good condition with static or upward trend.

In response the EIS team feels that Alternatives 1, 2 and 4 deal directly with this concern. Alternatives 1 and 2 analyze impacts of existing allocations and Alternative 4 analyzes impacts of reductions on allotments which have problems with current range condition and downward trend.

2. Another major concern was raised on use of range suitability criteria. The comments stated that suitability (50% slope) should not be used, especially as a strict interpretation. In the Ellis-Pahsimeroi area, suitability was not used in its strict interpretation for allocation of forage in the Proposed Action.

Ranchers were contacted and most of the allotments were ridden to map water availability, note areas of cattle use, gather information on needs of the allotment, and correlate the 50% slopes on the slope map with 50+% slopes on the ground.

The suitability information was mapped on overlays according to the criteria set forth in Washington Office Instruction Memo No. 78-134 dated March 17, 1978. These overlays were then shown and explained to the ranchers. Again their input was noted and recorded in the files or on aerial photos. This input was then available for the Area Manager to use at his discretion in modifying the Washington Office Instruction Memo criteria.

In addition, the watershed specialist was contacted to see how much of the area (by allotment) over 50% slope could be used without harming the watershed values. This data was also used to make the final allocation in the Proposed Action. Since Alternatives 1, 2, and 4 do not use the suitability criteria, it is felt the analysis of impacts of the use of suitability criteria is adequately handled to give the land manager enough data to make a decision.

3. Several comments were received that stated a desire for the BLM to prepare coordinated management plans. The BLM range management practices state that allotment management plans (AMPs) will be developed prior to changes in grazing systems and reductions in forage allocations. The AMPs will involve close cooperation between the BLM and ranchers and necessary Forest Service, Soil Conservation Service and Idaho Department of Fish and Game.
The Ship Estate turned out to be a castle in the sand and early victories between Bellflower and Rio Hondo. In the early 1970’s, the town was hit hard by the loss of its textile mills. The town’s economy was already in a state of decline due to the closure of its steel mills in the early 1960’s. The town’s future looked bleak until the late 1960’s when the town’s waterfront was redeveloped. The new waterfront was the start of a new beginning for the town. The town’s economy began to grow again and the town’s citizens were happy to be able to survive.

The town was then hit hard by the loss of its textile mills. The town’s economy was already in a state of decline due to the closure of its steel mills in the early 1960’s. The town’s future looked bleak until the late 1960’s when the town’s waterfront was redeveloped. The new waterfront was the start of a new beginning for the town. The town’s economy began to grow again and the town’s citizens were happy to be able to survive.

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Response to Public Hearing Comments

May 10, 1979

I. The evaluation process to prepare the Forest Plan and its implementation has been completed. The Forest Plan has been subjected to public hearings and public participation in the development of the plan. The Forest Plan is a comprehensive guide to the management of public lands in the region. The Forest Plan includes objectives and strategies for managing public lands to meet the needs of all users.

II. The Forest Plan includes a comprehensive review of the existing forest conditions and the objectives for managing public lands in the future. The Forest Plan includes a detailed analysis of the resource goals and objectives for managing public lands. The Forest Plan includes a comprehensive review of the existing forest conditions and the objectives for managing public lands in the future. The Forest Plan includes a detailed analysis of the resource goals and objectives for managing public lands.

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V. The Forest Plan includes a comprehensive review of the existing forest conditions and the objectives for managing public lands in the future. The Forest Plan includes a detailed analysis of the resource goals and objectives for managing public lands.
Jerry Hillegas
xls Team Leader
Buena Vista County
February 18, 1992

BEN LEVY MILLER
NATIONAL LAMB ASSOCIATION

Producers are threatened by multiple heterogeneous factors and they are challenged by multiple weaknesses when they make land use decisions. This was apparent in this planning unit where either body farms or supplemental systems of production were involved. How to make more adaptive decisions, there are various aggressive issues about the methods used to determine proper working capacity to these allotments. I do not believe that the BLM can properly assess the impact of all the current factors that are involved. The land use model in the current system is complex and has been specifically developed at least one hundred swap and simulated model. From these data should be used to design land use policies and resource management plans.

To review the procedure used: 1) BMP's mapped 100 sites and 100 sites by 750 sites on the local map. 2) If the estimated production using a single-county model and the 20 HP per degree day, 3) Entered the results in the appropriate data, 4) Plots, using the estimated production using a single-county model. 5) Calibrated the estimated production using a single-county model. 6) Plotted the results on the appropriate map.

I submit this eight procedure for the following reasons: 1) The concept of using a single-county model is less than when the estimated production using a single-county model is less. 2) The most significant variable in site selection is the land use model. 3) The most significant variable in site selection is the land use model. 4) I haven't used a method which attempts to estimate the effects of variables which are not used in the site selection. 5) I have used a method which attempts to estimate the effects of variables which are not used in the site selection. 6) I have used a method which attempts to estimate the effects of variables which are not used in the site selection. 7) I have used a method which attempts to estimate the effects of variables which are not used in the site selection. 8) I have used a method which attempts to estimate the effects of variables which are not used in the site selection.

The sections on social conditions on page 2-2 and 2-10.

The simple fact is that we are the ones that make the changes. We are the ones that make the changes. We are the ones that make the changes. We are the ones that make the changes. We are the ones that make the changes. We are the ones that make the changes.

I have reviewed the Environmental Assessment and I would like to offer the following comments for your consideration.

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I have reviewed the Environmental Assessment and I would like to offer the following comments for your consideration.
STATE OF IDAHO

DEPARTMENT OF HEALTH

COOPERATIVE EXTENSION SERVICE

By U.S. Department of Agriculture

BEST DOCUMENT AVAILABLE

19

BEST DOCUMENT AVAILABLE

20
To the Editor of Land Management:

As a member of the Lower Catskill Association which is located in the
Ella-Redmond area's Catskill Environmental Impact Statement area, I wish to
be associated with the following statement:

As a member of the Lower Catskill Association which is located in the
Ella-Redmond area's Catskill Environmental Impact Statement area, I wish to
be associated with the following statement:

I feel that the Environmental Impact Statement of the Lower Catskill
Association is not complete. The statement only highlights the
characteristics of the area and does not address the environmental
impact of the proposed activities. The statement should include a
more comprehensive analysis of the potential environmental
impact of the proposed activities. The statement should also
address the potential socioeconomic impacts of the proposed
activities.

Sincerely,
[Signature]
[Name]
Implementing NEDA (143 F 1975-5/2079, November 17, 1975), which states that "Applicants shall include the professional testing, including professional testing, the observances and environmental impacts statements." 

1. "The vegetation section (p. 4) states that "The season of grazing is important because ranges depend on vegetation reserves to start growth in the spring. In delayed treatment would provide plants to develop strong root systems to be well-stocked and not be dependent on range plants." Page 3 states that "Grazing during the spring, when plants are drawing heaviest on their storage, is not desirable for vegetation but leaves the plants to live in spring." 

2. "The analysis of these data seems to be aimed at supporting grazing other range vegetation, which I understand to be standard."

3. "Benacchi, H., and Ronca, 1975 (b), states concerning range vegetation that "Early-season species such as Elymus canaliculata, "a condition.""

4. "Grazing season comes when this period in the Billa-Felchman Draft EIS area?"

I would like to stress that early spring use (before range condition) is just the only important season period in extent plant growth. The range is dominated by the period from the beginning of the grazing season to the end of the grazing season. The vegetation should be in good condition and not be stressed during this period.
To the Head of Land Management.

I am writing this letter to request that a land management plan be prepared for the following area of land located in the

The area is located in the following general land management plan:

The land management plan is necessary because the current land management practices are not sustainable and are causing environmental degradation.

I am enclosing a map of the area to be included in the land management plan. The map shows the current land use and highlights the areas that require immediate attention.

I would appreciate it if you could provide me with a quote for the development of the land management plan and a timeline for its completion.

Thank you for your consideration.

Sincerely,

[Your Name]

[Your Title]

[Your Organization]
Mr. Jerry Williams  
3350 West Washington Blvd.  
Chicago, Illinois 60625

January 7, 1967

Dear Mr. Williams:

Since receiving the draft environmental impact statement on proposed range management in the Otero-Pinon area of New Mexico, we have taken the opportunity to review the document and make the following comments.

1. The environmental impact statement contains several tables and charts that present data and information relevant to the proposed range management plan. These tables and charts are well-organized and provide a clear overview of the study area and the proposed management actions.

2. The section on habitat quality and quantity is well-documented with references to scientific publications and other sources. The authors have conducted a thorough analysis of various habitat types and their associated species, providing a comprehensive understanding of the current condition and potential impacts of the proposed management plan.

3. The section on wildlife management and the implications for various species is detailed and includes specific recommendations for each species. The authors have considered the needs of both endangered species and those that are less conservation-minded, ensuring a balanced approach to wildlife management.

4. The economic analysis section is presented in a clear and concise manner, highlighting the potential benefits and costs associated with the proposed management plan. The authors have conducted a thorough economic analysis, including both direct and indirect costs and benefits.

5. The public engagement section is well-developed, with plans for community outreach and stakeholder engagement. The authors have outlined strategies for involving local communities and other stakeholders in the decision-making process, ensuring that their concerns and perspectives are considered.

6. The section on recommendations and conclusions is thoughtfully written, providing specific recommendations for the implementation of the proposed management plan. The authors have based their recommendations on the findings of the study and have considered the implications for both the environment and the local communities.

7. The appendix section includes additional supporting data and information, which is valuable for a comprehensive understanding of the study area and the proposed management plan.

In conclusion, the environmental impact statement on proposed range management in the Otero-Pinon area is well-written and thorough, providing a comprehensive overview of the proposed management plan and its potential impacts on the environment and local communities. The recommendations are based on sound scientific analysis and are designed to ensure a balanced approach to wildlife management and economic development.

Sincerely,

[Signature]

Director

Idaho State Historical Society

March 30, 1967

[Signature]

Director
Thanks for listening.

Ken White
This section contains all changes and corrections in the text of the Draft EIS.
Table 2-9: Alternative 3, make the following changes:

<table>
<thead>
<tr>
<th>Vegetation</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Current total production</td>
<td>Delete number</td>
</tr>
<tr>
<td>Initial forage allocation</td>
<td>Change 193,649 to 193,609</td>
</tr>
</tbody>
</table>

Visual Resources

Range Developments

- Change 2661 to 11,008
- Change (less than 1%) to (3%)

Table 2-9: Alternative 1, make the following changes:

<table>
<thead>
<tr>
<th>Vegetation</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Current total production</td>
<td>Delete number</td>
</tr>
</tbody>
</table>

Economics

Range Improvements

- Change "No Change" to "174,000"

Table 2-9: Alternative 2, make the following changes:

<table>
<thead>
<tr>
<th>Vegetation</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Current total production</td>
<td>Delete number</td>
</tr>
</tbody>
</table>

Non-consumptive

Range Developments

- Change 2661 to 11,008
- Change (less than 1%) to (3%)

37

38
Table 2-9; Alternative 5, make the following changes:

Vegetation
Current total production - Delete number

Page 3-20; Economics, Introduction, change 1st paragraph to read:

The livestock industry would be the most impacted by the various alternatives. According to the 1980 Idaho Agricultural Statistics, there were 23,500 stock sheep and lambs and 91,000 cattle and calves in the region as of January 1, 1980.

Table 4-4a

<table>
<thead>
<tr>
<th>Allotment</th>
<th>Proposed Grazing System</th>
<th>Deer</th>
<th>Elk</th>
<th>Antelope</th>
<th>Big Horn Sheep</th>
<th>Sage Grouse</th>
</tr>
</thead>
<tbody>
<tr>
<td>4401</td>
<td>Deferred</td>
<td>X</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>4405</td>
<td>Deferred</td>
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<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>4406</td>
<td>Deferred</td>
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<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>4407</td>
<td>Deferred</td>
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<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>4409</td>
<td>Deferred</td>
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<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
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<td>Deferred</td>
<td>X</td>
<td></td>
<td></td>
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<td></td>
</tr>
<tr>
<td>4411</td>
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<td></td>
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<td></td>
</tr>
<tr>
<td>4412</td>
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<td></td>
<td></td>
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<tr>
<td>4413</td>
<td>Deferred</td>
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<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>4502</td>
<td>Deferred</td>
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<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>4503</td>
<td>Deferred</td>
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<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>4504</td>
<td>Deferred</td>
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<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>4505</td>
<td>Deferred</td>
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<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>4507</td>
<td>Deferred</td>
<td>X</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>4509</td>
<td>Deferred</td>
<td>X</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>4510</td>
<td>Deferred</td>
<td>X</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>4511</td>
<td>Deferred</td>
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<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>4514</td>
<td>Deferred</td>
<td>X</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>4515</td>
<td>Deferred</td>
<td>X</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>4516</td>
<td>Deferred</td>
<td>X</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>4521</td>
<td>Deferred</td>
<td>X</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Page 4-20; Table 4-5: As a result of changes to Alternative 4 in the Draft EIS, the following changes have been made (no changes in the long-term table).

Table 4-5

<table>
<thead>
<tr>
<th>Group</th>
<th>1</th>
<th>2</th>
<th>3</th>
<th>4</th>
<th>5</th>
<th>6</th>
<th>Total</th>
</tr>
</thead>
<tbody>
<tr>
<td>Alternative 4</td>
<td>4297</td>
<td>2873</td>
<td>864</td>
<td>10881</td>
<td>5331</td>
<td>3189</td>
<td>27435</td>
</tr>
<tr>
<td>% Chg. Act.</td>
<td>-3</td>
<td>-5</td>
<td>-1</td>
<td>+1</td>
<td>-7</td>
<td>0</td>
<td>-2</td>
</tr>
<tr>
<td>% Chg. Avg.</td>
<td>-5</td>
<td>+1</td>
<td>+9</td>
<td>+8</td>
<td>+1</td>
<td>+8</td>
<td>+3</td>
</tr>
<tr>
<td>Annual Income</td>
<td>-$4296</td>
<td>+$158</td>
<td>+$153</td>
<td>+$4166</td>
<td>+$136</td>
<td>+$6192</td>
<td>+$6509</td>
</tr>
</tbody>
</table>
Forage Allocation

Initial stocking rates under this alternative would be based on condition and trend of the allotment. This would serve to bring grazing use more in line with inventoried carrying capacity. There would be 27,435 AUMs allocated for livestock grazing, a 544 AUM reduction (1.4 percent) from current active preference.

Grazing Management

Only 11 allotments would be scheduled for intensive management: Findley Basin, Allison Creek, Hat Creek, Falls Creek, Patterson Creek, County Line, Lower Goldburg, Big Creek, Bear Creek, Hamilton Seeding, and Mahogany Creek. Of these, there would be 4 allotments in deferred-rotation (20,083 acres), 4 in rest-rotation (43,828 acres), and 3 in seasonal grazing (13,914 acres). This is 21 percent (77,825 acres) of the grazed acres in the EIS area.

The largest amount of management will be spent on these 11 allotments. Of the remaining 22 allotments not identified above, about 9 will also receive intensive management over the long term.

At the end of 20 years, it is expected that a total of 9 allotments will be operating under rest-rotation (182,765 acres), 8 under deferred-rotation (48,345 acres) and 16 under seasonal grazing (141,106 acres).

Management on the 11 priority allotments will take place on a 5 year schedule. Scheduled management on the remaining 22 allotments will be over a 20 year period. After 20 years, benefits to vegetation would be approaching 87 percent of the Proposed Action objectives.

Range Developments

All range improvement projects scheduled for the 11 allotments discussed above will be implemented on a 5 year schedule. Those not proposed for the 11 allotments, will be completed in the long-term (20 years).

The results, after 20 years would be as follows: 48 miles of pipeline, 53 troughs, 18 reservoirs, 56 miles of fence and 9,320 acres of new vegetation manipulation. Also, 2,460 acres of vegetation manipulation maintenance would be done.

The above mentioned range improvements are necessary for the success of the proposed grazing management systems. As discussed under Grazing Management, benefits to vegetation after 20 years will be approaching 87 percent of the proposed objectives.

Page 4-41, Visual Resources, following text change; paragraph 1, sentence 1: "...54 acres of water development... 112 acres would be effected in the long-term," to "...54 acres of water development... 143 total acres would be effected in the long-term."

paragraph 1, sentence 3 & 4: change the "58 acres" to "70 acres"; and change the "54 acres" to "73 acres".

paragraph 2, change to read: "Twenty-four miles of fence... 24 acres... and 56 miles with 20 years, would effect 67 acres. In the long-term..."

paragraph 3, Change the number "10,144" to "11,780"

paragraph 4, change the following numbers: "8,882 and 10,296" to "8,889 and 11,690".

Page 4-41, Cultural Resources, make the following changes; paragraph 1, line 1: change "7,840" to "11,690" and "2 percent" to "3 percent" paragraph 2, line 2; change: "...seven allotments (63,590 acres or 17 percent of the EIS area). On three allotments (63,450 acres)..." to "...Sixteen allotments (167,651 acres or 44 percent of the EIS area). On seventeen allotments (212,807 acres)..."

paragraph 3, line 1; change: "...71,430 acres or 19 percent..." to "...179,641 acres or 47 percent..."
Page 4-42, Alternative 4, Economics; change first sentence under Rancher Income to read: In the short-term this alternative would have an annual income gain of $6500.

Rancher Income: Change table number at the end of paragraph from Table 2 to Table 4-6.

Range Improvements: Change existing numbers ($475,000; $84,000; $29,000; and $17,000) to the following numbers ($440,000; $76,000; $19,000; and $11,000) respectively.

Change sentence under secondary Income Impacts to read: In the short-term the secondary income changes would amount to an additional gain of $2900. In the long-term...

Page 4-43, Alternative 4, Economics; change paragraph under Summary to read:

Rancher income would increase by $6,500 in the short-term, $17,000 in the long-term. Range improvements would cost $441,000 with $76,000 spent locally. Maintenance costs would be $19,000 annually with $11,000 spent locally. Secondary impacts would increase income by $2,900 in the short-term and $5,200 in the long-term. Employment would increase by one job in the short-term and three jobs in the long-term. No impact would occur on ranch consolidation. In the short-term, capital position would be worsened for most permittees. The regional net percent worth would be $418,000.

Table 4-7, Alternative 4

Short-Term Use
First paragraph change: "26,289" to "27,435" and "1,290" to "544"
Third paragraph change: "8,882" to "8,889"
Forth paragraph change: "6" to "7"

Long-Term Productivity
Change: "11.5" to "11" and "29,764" to "30,464"

Irretrievable
First paragraph change: "67" to "59"
Second paragraph change: "19" to "47"

Page B-6, Appendix B; Table B-3, change: "Pounds per acre" to "pounds per month".


Page R-3, References; change: "Tisdale, E.W and M. Hironaka" to "Tisdale, E.W. and M. Hironaka".

Map 2-2; Legend - Change: "Crooks Canyon Wildlife Area" to "Cronks Canyon Wildlife Area."