

November 2, 1984

Mr. Joe Zimmer  
Boise District Manager  
Bureau of Land Management  
3948 Development Avenue  
Boise, Idaho 83705

Dear Mr. Zimmer:

The Idaho Chapter of the Wildlife Society has reviewed the Draft Environmental Impact Statement (DEIS) for the proposed Jacks Creek Wilderness. We recommend that the Bureau of Land Management (BLM) adopt Alternative 3 as the preferred plan rather than the one proposed in the DEIS.

During our review of the document we contacted biologists familiar with the wildlife resources of the area. Our recommendation encompasses most (87%) of the habitat for the California bighorn sheep in the study areas as well as habitat for numerous other native wildlife species. The life requisites of these indigenous species must be provided for if the proposed areas are to maintain their wilderness value. Increases in livestock grazing levels would be detrimental to these wildlife species.

After review of this document we conclude that the report is generally biased towards livestock uses of the area and there are contradictory statements made throughout. For example, on page 20 the report indicates that the BLM estimates that increases in livestock numbers could average 10% in areas after they have been designated as wilderness. Then on page 59 the report acknowledges that "...increasing the amount and distribution of humans or livestock in bighorn sheep habitats can result in a corresponding reduction in bighorn use..." Since bighorn sheep and other indigenous wildlife species are so vital for the natural and ecological values associated with the proposed wilderness designations why does the BLM suggest that increases in livestock use will be allowed?

On page 100 the report tries to justify 8.5 miles of watering pipeline and increased livestock use under the proposed action alternative. Several statements are made as to how good range condition would be maintained even under increased livestock use in areas near the watering pipeline. Moderate grazing levels are mentioned and referenced as being beneficial to native bunch grasses. However, there is no indication as to what constitutes heavy, moderate, or light grazing levels. What may be moderate to one person may not be to another. The report also cites substantial increases in livestock AUM's for specific grazing allotments but we could find no maps that located these allotments in relation to the boundaries of the wilderness areas or bighorn sheep habitat. Definite explanations, definitions, and locations of related management actions should be provided so that the public can evaluate the alternatives.

We do not recommend the proposed action because of the decrease in wilderness acreage (with a corresponding 20% decrease in bighorn sheep habitat) and the installation of 8.5 miles of water pipeline in the Little Jacks Creek study area. While there may be some wildlife benefits associated with expanded water distribution as a result of the pipeline, the increase in livestock grazing and human intrusion would be detrimental to wildlife in the long term. We believe that Alternative 3 represents a fair compromise between the resource uses on public land for the wilderness alternatives proposed in this document. We also request that the BLM re-evaluate the appropriateness of increasing livestock grazing levels in or near designated wilderness areas. This management decision appears to be in direct conflict with the aesthetic and ecological values associated with wilderness areas.

Sincerely yours,

Dr. Lewis Nelson  
President, Idaho Chapter of  
the Wildlife Society

cc: BLM, State Office, Boise  
ICL, Boise  
Wildlife Federation, Boise  
Gov't. Evans