



IDAHO CHAPTER  
**THE WILDLIFE SOCIETY**

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September 30, 1976

NATIONAL HEADQUARTERS  
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WASHINGTON, D.C. 20016

Dr. V. E. McKlevey  
U.S. Geological Survey Bureau  
National Center  
Reston, VA 22092

Dear Dr. McKlevey:

The Idaho Chapter of the Wildlife Society has reviewed the draft Environmental Impact Statement prepared on the proposed, "Development of Phosphate Resources in Southeastern Idaho."

It is our contention that this draft is inadequate and deficient in: 1) Addressing the total impacts that the proposed mining and related activities will have on fish and wildlife resources, 2) providing suitable alternatives to the proposed action and 3) promoting adequate measures to mitigate impacts.

We find a general lack of commitment by the responsible agencies in stipulating safeguards to protect fish and wildlife resources. No mention is made in the Statement as to what extent those agencies, both state and federal, will guarantee compliance with existing laws and regulations. Violations of existing environmental regulations have and are occurring, leaving us with the assumption that these actions may continue.

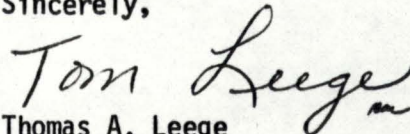
As used in the draft Statement, we feel the word "reclamation" is used improperly. Reclamation programs should be geared to the restoration of native vegetation. In many cases, exotic species have been planted on dump sites. These "exotics" do provide ground cover for aesthetics and soil stability, but do little to replace the winter wildlife forage plants that were eliminated by the mining.

Although it is recognized in the Statement that severe wildlife impacts will occur, no mitigative measures, except for compliance with existing laws and regulations, are proposed. The Statement fails to explore more desirable alternatives which would require changes in antiquated mining laws. The mitigation proposals fall short of protecting and maintaining existing quantity and quality of fish and wildlife habitat. Measures used to prevent losses and to replace land and habitat should be described along with the assurance they will be carried out should the proposed action be approved. The question of financial responsibility for these measures must also be explored.

That portion of the Statement pertaining to the transportation system is inadequate because it does not address the impacts on fish and wildlife created by new construction or expansion of existing routes. No analyses are included of impacts created by the storage of empty ore cars during the off season. Migration routes could be blocked or other wildlife problems could result. Where will the sites be and what will be the length of stored train segments?

We are opposed to any new mines opening up until all wildlife impacts are adequately addressed and complete mitigation guaranteed. We are also opposed to the construction of any processing plants within the Blackfoot River drainage unless adequate measures in construction and operation can be provided to preserve the present high level of water quality and fish habitat in the watershed.

Sincerely,



Thomas A. Leege  
President  
Idaho Chapter  
The Wildlife Society

TAL/cae

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