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Boise, Idaho
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June 5, 1980

Jim Gabettas
Bureau of Land Management
Boise District Office
230 Collins Road
Boise, Idaho 83702

Dear Mr. Gebettas:

Please regard this as written testimony in response to the draft Owyhee Grazing Environmental Impact Statement (DEIS).

The Idaho Chapter of The Wildlife Society is appreciative of the Bureau of Land Management's (BLM) efforts to provide for wildlife habitat under the multiple use objectives of the Federal Land Management Policy Act and believes the array of alternatives developed reflect this effort. While the interests of wildlife and therefore The Wildlife Society would be best served by Alternative #3 (Maximize wildlife and watershed), or a similar plan, we recognize that under the philosophy of multiple use, a reasonable balance of objectives must be obtained. As such, The Idaho Chapter is in general agreement with the proposed action as presented in the draft DEIS. Comments to the proposed action are enumerated below.

- (1) BLM's emphasis on rangeland rehabilitation, protective management of streams and the desire to have wildlife a major benefactor of the project is proper. Permanent improvements to habitat are required.
- (2) Siltation and high temperatures, problems attributed to use of riparian habitat by domestic ungulates, should be effectively controlled. Based upon information presented in the DEIS, it is not possible to identify whether riparian areas are included within fenced areas or if other proposed control measures will effectively solve the problems.
- (3) Chaining and burning of vegetation are rehabilitation tools highly disruptive to the soil. To avoid undue erosion, we suggest that these tools be used only when the potential for heavy rainfall (accelerated runoff) is low. We prefer prescribed burning with wildlife needs in mind. The DEIS does not detail how much and where chaining and burning will occur. BLM needs to adhere to sage grouse, antelope, deer and other wildlife management guidelines when conducting these practices.

- (4) The use of log structures to control stream trailing is concern. Never-the-less our concerns include the effectiveness of the structures, their estimated life span, maintenance requirements, and potential to create flow restrictions and passage blocks to fish.
- (5) Reservoirs and springs should be managed to maintain or create downstream riparian and wet meadow values. Spring source protection is very important and strongly encouraged.
- (6) Facilities should be provided, and management schemes devised, to protect the natural values of areas receiving high human foot traffic and O.R.V. use (i.e. Jump Creek).
- (7) The Idaho Chapter believes the ultimate goal of the proposed action, after rehabilitation, should be management as a near self-sustaining system. Continued levels of intensive land management, which may be of benefit to the grazing of livestock, are a costly public expenditure and may be environmentally damaging.
- (8) Grazing permit fees should be commensurate with the cost of improvements for livestock grazing. If not, the proposed action will amount to a public subsidy of the private sector.
- (9) Important deer winter range is often used by cattle during late summer and early fall (see pp 4-20, 21, 22 and Table 4-8). Several winter range areas have grazing systems which are going to be detrimental to vegetation used by wintering deer. BLM is encouraged to reconsider use of these grazing systems on deer winter range.
- (10) We emphasize that it is critically important for BLM to adequately monitor permitted livestock stocking rates and assure that extra livestock are not ranged.

The Idaho Chapter is grateful for this opportunity to provide comment to the EIS process. We trust the final document will reflect our comments and concerns.

Sincerely,

Jay Gore, President
Idaho Chapter

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