

March 18, 1974

The Honorable Rogers Morton
Secretary of the Interior
L.L.M. 320
Washington, D.C. 20240

Re: Robert M. Henggeler Desert Land Application, I-597
Initial Classification Decision, Bureau of Land Management, Idaho

Dear Secretary Morton:

The above Initial Classification Decision, dated March 7, 1974, relative to the allowance of a desert entry in the Blacks Canyon Island area of Payette County, Idaho, is of concern to the Idaho Chapter of the Wildlife Society. The Idaho Chapter is composed of 180 professionals who work with wildlife and related resources within the State of Idaho. It embraces and adheres to the policy of The Wildlife Society which states that the Society "...will oppose activities or developments which threaten the continued existence of any wildlife species".

The classification for allowance of Desert Land Entry Application I-597 is a case in point. Of itself it is perhaps insignificant. However such action by the Bureau of Land Management, by its own admission, could set a precedent to ".....open up certain lands that were heretofore considered unsuitable for agricultural entry and could conceivably create a new breed of desert land petition applications" (Environmental Analysis Record - Boise District, BLM). Setting such a precedent might be acceptable in certain instances but in this instance the subject tract lies within an area of important nesting and brood-rearing habitat for the Northern long-billed curlew (Numenius americanus parvus).

The long-billed curlew is a species of shorebird which has an apparent requirement for upland grasslands removed from rivers, marshes, and other wetland areas

that provide the balance of its yearly requirements from such a unique and diverse habitats. Its range is now much reduced because of man's encroachment and conversion of suitable nesting and brood-rearing habitat to other uses, such as agricultural crop production. The breeding areas of the long-billed curlew are now confined to a diminishing habitat in southwestern Canada and the United States west of the 100th meridian. Details on its abundance and distribution within this area are largely unknown. Accordingly, this species is classified as "status undetermined" by the Bureau of Sport Fisheries and Wildlife. The Washington State Department of Game has recognized the environmental stress within which the long-billed curlew is found and has classified it as "deserving of special attention" -- a status, in our opinion, equally applicable to Idaho as well.

Review of the Initial Decision and subsequent examination of the Proposed Decision shows but token effort in compliance with the National Environmental Policy Act and a complete lack of attention to the Endangered Species Act. Section 2(c) of the Endangered Species Act of 1973 (P.L. 93-205) states: "It is ...declared to be the policy of Congress that all Federal departments and agencies shall seek to conserve endangered species and threatened species and shall utilize their authorities in furtherance of the purposes of this Act". Section 2(b) defines the purposes of the Act, in part, as: "...to provide the means whereby the ecosystem upon which endangered species and threatened species depend may be conserved, to provide a program for the conservation of such endangered species and threatened species". This Congressional mandate has direct application to the decision by the Bureau of Land Management to permit, even encourage, the disposal of Public Lands the cumulative effect of which would have significant impact upon the "ecosystem upon which endangered species and threatened species depend". "Status undetermined", in our view, serves to flag a species in trouble. It is our considered opinion that such a species is worthy of full consideration of its needs prior to any action that creates greater environmental stress.

With the foregoing in mind it is difficult to understand how the Bureau of Land Management can issue a decision disposing of lands critical to the long-billed curlew as nesting and brood-rearing habitat (one of two known such habitats in Idaho). It is incumbent upon the Bureau of Land Management to comply with applicable law (National Environmental Policy Act and the Endangered Species Act).

Therefore it is the position of the Idaho Chapter of The Wildlife Society that the Initial Classification Decision relative to Desert Land Application, I-597, be vacated.

It is imperative that additional study and understanding of the distribution, life history requirements, and status of the long-billed curlew be determined prior to further encroachment upon and destruction of its habitat. We therefore respectfully ask that you further instruct the Bureau of Land Management, State Director, Idaho, to initiate detailed study of the status of the Northern long-billed curlew population, distribution, and relationship to land use alternatives in the Black Canyon Planning Unit (and other areas in Idaho where this species is found) prior to decisions for ~~land disposal~~ or other actions having adverse impact upon the Northern long-billed curlew.

Sincerely,

Levi Mohler
Resolutions Chairman
Idaho Chapter, The Wildlife Society

Copies: Fred Evenden, The Wildlife Society
Robert Turner, National Audubon Society
Phillip Schneider, National Wildlife Federation
William Morse, Wildlife Management Institute
Russell Train, EPA