

Lynn R. Irby, President  
Northwest Section - The Wildlife Society  
Fish & Wildlife Management & Research  
Department of Biology  
Montana State University  
Bozeman, Montana 59717-0346

March 31, 1994

Dear Lynn:

As you are aware, the United States Air Force has proposed an Idaho Training Range be constructed upon the Owyhee Range of southwest Idaho for the purpose of training Air Force personnel techniques in deployment of ordnances (bombs and flares).

The Idaho Chapter has provided testimony to the Air Force opposing the proposed action as identified in the Draft Environmental Impact Statement. The Idaho Chapter bases our opposition both on probable detrimental effects upon wildlife resources and on poor public disclosure of effects in the DEIS itself.

At this time, the Idaho Chapter requests the support of the Northwest Section in opposing the proposed action for a Idaho Training Range. Timely response to the Air Force from the Northwest Section and National - The Wildlife Society may have a significant effect upon the future of the proposal and the protection of Idaho's valuable wildlife desert habitats.

If you have specific questions related to the Idaho Training Range Proposal, please contact myself or Dr. Dale Toweill.

Thank you for your immediate attention to this important matter.

Sincerely,

ERNEST D. ABLES  
President, Idaho Chapter

cc  
D. Toweill



Thomas Franklin  
The Wildlife Society  
5410 Grosvenor Lane  
Bethesda, MD 20814-2197

March 31, 1994

Dear Tom:

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President, Idaho Chapter

cc  
Lynn R. Irby  
D. Toweill



IDAHO CHAPTER OF THE WILDLIFE SOCIETY TESTIMONY  
regarding the  
IDAHO TRAINING RANGE  
Draft Environmental Impact Statement

The Idaho Chapter of The Wildlife Society is comprised of approximately 200 professional wildlife biologists working in Idaho. We are the state affiliate of The Wildlife Society which is an international organization. As part of their professional responsibilities, our members review hundreds of proposals state-wide that can potentially affect wildlife resources in Idaho. Some proposals are considered relatively benign in their potential to affect wildlife populations or wildlife habitats, while others pose serious threats to wildlife resources. The Idaho Chapter has reviewed the Idaho Training Range (ITR) Draft Environmental Impact Statement (DEIS). Let there be no question that the proposed action for the Idaho Training Range falls within the category of proposals that may have severe affects upon wildlife resources in south-west Idaho.

The DEIS identifies many of the Chapter's concerns regarding potential impacts to wildlife, including:

- stress effects from low-altitude flights upon wildlife - these include pronghorn antelope, mule deer and California bighorn sheep, raptors, waterbirds and upland game birds,
- disturbance to wildlife from increased human access, particularly during the breeding seasons - especially upon bighorn sheep, pronghorns, sage grouse and raptors,
- reduction in habitat from fire resulting from ordnance and flare use,
- reduction in habitat from construction of firebreaks intended to limit wildfire spread,
- potential bird-aircraft collisions,
- degradation or loss of riparian habitat within target areas,
- grass and sagebrush habitat degradation within the target areas, especially affecting small mammals, reptiles, gallinaceous birds and passerine birds (including neotropical migrant birds),
- introduction of noxious weeds within target areas and other disturbed sites, and
- cumulative effects of these impacts with adjacent actions and other proposals.

While the Idaho Chapter finds these issues identified in the DEIS, most of the discussions are inconclusive, understated or dismissed on lack of knowledge. Such statements as found on page 4-118 of the DEIS serve as examples of the



insufficient disclosure of impacts; "Species composition and abundance of small animal populations are LIKELY TO CHANGE within and adjacent to targets and other cleared areas". Such statements offer little information to the public regarding magnitude, direction or duration of change. In the same paragraph, positive impacts to raptors within target areas are implied by the statement: An example of a positive impact to raptors from ordnance delivery is described in Jackson et al. (1977), wherein it was SURMISED that a harrier continuing to hunt through ordnance delivery was PROBABLY taking small mammals and birds flushed from cover". This observation does not offer conclusive evidence of short- or long-term benefits to raptors from ordnance delivery. Finally, this paragraph concludes with the statement: "Due to the abundance of similar habitat in the combined restricted areas, loss of some habitat in the target areas is not expected to adversely affect raptor populations". The Idaho Chapter does not agree that impact areas spanning 13,000 acres under Option 1, and 11,800 acres under Option 2 of the proposed action can be accurately described as "some habitat". These citations serve as examples of poor scientific rational and weak conclusions commonly found within the DEIS regarding impacts to wildlife.

The Idaho Chapter suggests more extensive presentation of cumulative effects regarding biological resources within the DEIS. Just two pages of text spanning pages 4-176 through 4-178 do not adequately address the cumulative impacts with other actions that may take place within and adjacent to the proposed training range. MORE IMPORTANT, the Idaho Chapter encourages greater disclosure of cumulative effects that will likely result from the individual impacts described separately for biological resources in the DEIS, including (but not limited to) low-elevation flights (in future years) occurring over degraded habitats (resulting from ordnance use, fires, firebreaks, etc.) and greater human access and activity.

The Idaho Chapter has reviewed the appendix material including Appendix M - State of Idaho Range Development Recommendations. It is our understanding that the contents of Appendix M were offered by the Idaho Department of Fish and Game as options to mitigate the potential effects of the proposed training range expansion in Idaho. While this information is provided in the appendices, it is not apparent that these recommendations were incorporated into the proposed action or alternatives. Of particular concern is the minimal consideration given to alternative sites that would provide for Air Force training needs while involving less critical wildlife habitats. Because these recommendations have not been incorporated into the proposed action, it is unclear to the Idaho Chapter whether these recommendations were ignored, dismissed as not having merit, or consciously decided against during development of the proposed action. The Idaho Chapter suggests that these recommendations be included as part of the proposed action and that the final EIS show greater disclosure in the handling of recommendations offered in Appendix M.

The Idaho Chapter will submit more detailed comments to the DEIS in writing. We remain deeply concerned for the potential impacts of the proposed action upon wildlife resources, and offer our full endorsement of the No Action alternative.

We appreciate this opportunity to provide our remarks today.



June 30, 1992

Captain David B. McCormick  
Air Compact Command Environmental Analysis Division  
ACC/CEVE  
Langley Air Force Base, Virginia 23665

Dear Captain McCormick:

The Idaho Chapter of the Wildlife Society is providing to following scoping comments on the proposed air-to-ground tactical training range in Idaho.

- o The Air Force failed to establish the need for the proposed development of additional bombing range facilities. Considering today's economic and post-cold war environment, the proposal should be given more detailed feasibility analysis.
- o The original environmental documents failed to consider alternatives to the development of a new tactical range. Analysis of these alternatives should include existing ranges in Nevada, Oregon and Utah. The Bureau of Land Management has also proposed alternatives to the Big Springs range proposal and these alternatives should be given full consideration. The Big Springs/Owyhee site represents a high value desert habitat for disturbance sensitive species such as the California big horn sheep, redband trout and various raptor species. The area also provides Idaho residents one of the remaining unique desert recreational experiences which will be significantly altered under the current proposed activities.
- o The development of roads throughout the Owyhee desert should be fully analyzed for both the Big Springs range and the emitter sites. Increased roads cause additional disturbance and other habitat impacts, especially in currently inaccessible areas such as the Owyhee deserts.
- o The effects of chaff, flares, and other training devices should be adequately analyzed for resident fish and wildlife species. These devices may cause respiratory impacts to wildlife and increase the potential for wildfire in many areas.



Please include the Idaho Chapter on any future mailings regarding this proposal. We will continue to provide review and comment on future environmental documents.

Sincerely,

THE WILDLIFE SOCIETY

Paul Moroz  
President, Idaho Chapter

HERE ARE SOME  
EARLIER RESPONSES  
WE MADE TO THE  
AIR FORCE RE:  
THE IDAHO TRAINING  
RANGE



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