

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 for private organizations and state and federal agencies in Idaho. As part of their professional responsibilities, these biologists 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 addresses most of the Chapter's concerns regarding potential impacts to wildlife, including:

- stress affects from low-altitude flights upon wildlife - these include large 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,
- potential bird-aircraft collisions,
- degradation or loss of riparian habitat within target areas,
- grass and sagebrush habitat degradation within 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, many of the impacts are inconclusive, understated or dismissed on lack of knowledge. Such statements as found on page 4-118 of the DEIS; "Species composition and abundance of small animal populations are likely to change within and adjacent to targets and other cleared areas" 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 in the DEIS, including (but not limited to) low-elevation flights occurring over degraded habitats having 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 as an appendix, it is not apparent that these recommendations were incorporated into the proposed action. Instead, it appears to the Idaho Chapter that most of the recommendations were either ignored, dismissed as not having merit, or consciously decided against including in the proposed action. The Idaho Chapter suggests 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 full endorsement of the No Action alternative.

We appreciate this opportunity to provide our remarks today.