Idaho Bureau of Land Management

Management Framework Plan

Bennett Hills and Timmerman Hills M-13 1980

Bennett Hills/Timmerman Hills Management Framework Plan

This plan has been prepared following the principles of multiple use, sustained yield, public participation, and intergovernmental coordination. I find that this plan complies with the standards prescribed in 43 CFR 1601.8(b)(1), and is a valid land use plan.

Date

allentes C. Imaura

Signature

Form ISO 1600-2 (November 1975)

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UNITED STATES DEPARTMENT OF THE INTERIOR BUREAU OF LAND MANAGEMENT

MANAGEMENT FRAMEWORK PLAN TITLE PAGE

MFP TITLE: BENNETT H	IILLS-TIMMERMAN HILLS	•
STATE	DISTRICT	
IDAHO	SHOSHONE	
RESOURCE AREA(S)	PLANNING UNIT(S)	NUMBER(S)
BENNETT HILLS	BENNETT HILLS	0504
WOOD RIVER	TIMMERMAN HILLS	0506

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ORIGINAL MFP RECOMMENDED	DATE	ARCA MANAGER
(Step 2)	7/16/76	Sory I Stansen
ORIGINAL MFP RECOMMENDED	DATE	DISTRICT MANAGÉR
(Step 3)	7/23/76	Martes C. Brance
ORIGINAL MFP CONCURRED	DATE	CHIEF, DIVISION OF RESOURCES
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MFP SUMMARY APPROVED	DATE	STATE DIRECTOR
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APPROVED FOR IMPLEMENTATION	DATE	DISTRICT MANAGER
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REVISIONS

REVISION RECOMMENDED (Step 2)	DATE	AREA MANAGER
REVISION RECOMMENDED (Step 3)	DATE	DISTRICT MANAGER
REVISION CONCURRED	DATE	CHIEF, DIVISION OF RESOURCES
· ·	DATE	CHIEF, PLANNING COOR. STAFF
APPROVED FOR IMPLEMENTATION	DATE	DISTRICT MANAGER

Form ISO 1600-1 (March 1973)

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UNITED STATES DEPARTMENT OF THE INTERIOR Bureau of Land Management

DISTRICT

Shoshone

RESOURCE AREA

PLANNING SYSTEM PROGRESS CONTROL

Bennett Hills

NAME OF PLANNING UNIT Bennett Hills	URA STEPS 3 & 4			MFP STEP 1				
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STEP 3 DECISION PHASE BENNETT HILLS-TIMMERMAN HILLS MANAGEMENT FRAMEWORK PLAN

Step 3 is the decision phase of the Management Framework Plan. It summarizes the multiple use recommendations formulated in Step 2 of the MFP, by adopting certain recommendations as formulated, modifying or rejecting others.

The decision phase is a result of formulation of objectives and land-use recommendations compiled by BLM staff specialists with the help of user groups, individuals, state and local agencies, and the interested public.

Step 3 of the Bennett Hills-Timmerman Hills MFP is not a summary document by itself but a summary review and acceptance or modification of the Step 2 phase, incorporating all documented public and individual input.

As such, the following terms are applied to the Step 2 multipleuse recommendations:

<u>Adopt</u>: Accept this recommendation as Step 3 decision guidance until or unless modified by additional future information.

<u>Defer</u>: Postpone action indicated by the recommendation unless or until future need and interest indicate adoption.

Modify: The Step 2 multiple use recommendation is modified and rewritten.

<u>Reject</u>: Delete Step 2 multiple use recommendation in its entirety, resolving conflict with other recommendations.

BENNETT HILLS-TIMMERMAN HILLS

MANAGEMENT FRAMEWORK PLAN SUMMARY

The objectives of this Management Framework Plan are straightforward and follow the concepts of multiple use management. There are no particular overriding considerations in any of the resource activities. All of the activities received equal considerations during the planning process. Historically the use of the National Resource Lands within these two planning units has been heavily oriented toward livestock grazing. Use by wildlife, particularly sage grouse and wintering deer, has been significant over the years. Even though present wildlife numbers are down, the potential for increased wildlife numbers and, therefore, habitat needs is significant. Interest in recreation on the National Resource Lands within these units has increased over the past few years and is expected to increase more as time passes. Minerals within the planning area are limited primarily to sand, gravel, and fill material. However, occurrence of these materials on National Resource Lands is significant, derived from the fact they are relatively limited within the Magic Valley area. Watersheds within these planning units do not show signs of severe erosion, although the watershed condition could be significantly improved by improving the vegetation which exists on the soil.

Within the lands activity the overall objective is to serve the needs of the general public and more specifically to identify the National Resource Lands which could be used to meet the national needs of food and fiber without having a significant impact on other resource activities. This can be accomplished by reviewing lands classified for retention under the classification and multiple use act to identify those areas which meet the criteria of having available water, suitable soils, and topography. Secondly, a more complete inventory of existing agricultural trespass should be completed and those areas which logically fit into existing farm operations should eventually be transferred to private ownership, provided that other highly significant public values do not exist. There is very limited need for lands to be made available for urban and suburban expansion within these planning units. Some lands should be reserved for this purpose in the vicinity of the community of Bliss. There is some need for land to be transferred to the various communities under the Recreation and Public Purposes Act. This falls primarily within the area of sanitary landfills and limited refuse disposal sites. There are also several areas which could be used for recreation purposes, provided that a suitable group could be identified to administer the particular area. The utility corridors are farily well established within these planning units and new facilities should be aligned with these corridors to the extent possible. There are some areas within the planning units where the environment could be improved appreciably by rehabilitating excavated material sites and general clean-up of old random dump sites.

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The most significant minerals within these planning units are sand, gravel, and fill materials. An effort should be made to identify areas that can be used to extract these materials, provided the minimum impact on the other resources occurs. The materials should be made available to the State Highway Department, county road departments, and to the general public through the designation of community pits. Oil and gas and geothermal resources have not been discovered within these planning units; however, some interest has been shown in obtaining leases for these resources. Should some positive discovery of these resources occur within the planning unit, every effort should be made to make the areas available for development because of the energy significance, provided the least possible impact on other resources occurs. There are very few precious minerals known to exist in the planning areas. However, should discovery occur an effort should be made to make the materials available for private use.

The overall objective of the recreation activity should be to provide for the future use since existing recreation use is not intense. This can be accomplished in a number of ways, among which are providing additional fishing and hunting opportunities throughout the area. Off-road vehicle use has increased over the past several years and should be expected to increase more in the future. Most of the National Resource Lands within these planning units should be identified as open to off-road vehicle use, with the exceptions of areas adjacent to raptor nests and areas of concentrated deer winter use. There are few swimming or boating areas within the planning area; however, those that do exist should be maintained and improved primarily by improving the quality of water flowing into these areas. The visual resource within the planning area is relatively good at the present time. The area should be managed to maintain a quality visual resource, and all land alterations should take into consideration maintaining this quality. Cultural resource values within the planning areas have the potential of a relatively high significance to the Southcentral Idaho region. Very little is actually known about these resource values at the present time, therefore, every effort should be made to preserve the cultural resource values within the unit when undertaking any kind of project which would alter the landscape. Rockhounding and berry picking are fairly popular activities within the planning area. There are a number of known areas and other areas that could be identified in the future. These areas should be retained and managed for this purpose wherever possible. Some of the specific recreation areas identified within the planning area are as follows:

- 1. <u>Fir Grove</u>: This unique ecological area should be preserved and designated as an environmental study area.
- Mormon Reservoir, Thorn Creek Reservoir, Silver Creek, and Richfield Canal: All of these areas have significant recreation values, primarily for fishing. All of them have the potential for adjacent recreation developments. These developments should be pursued on a limited basis.

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- 3. <u>Black Buttes Rest Area</u>: This unique lava area, similar to the Craters of the Moon, has potential for minimum development. However, public opinion at the present time indicates that the area is not needed and should be preserved for development at a later date.
- 4. <u>Bliss Rodeo Grounds</u>: These rodeo grounds were apparently developed in trespass a number of years ago. An effort should be made to determine whether this facility would serve a significant public need. If a need is identified then a suitable organization should be identified to acquire the area under a recreation and public purposes lease.
- 5. <u>King Hill Back Country Area</u>: This area shows considerable potential for designation as a Back Country. However, a significant portion of the total area lies within the Boise District west of King Hill Creek; therefore, the area should be preserved for potential Back Country designation and no actions permitted which would alter the current aesthetic values which exist until such time as the Bennett Mountain MFP in Boise District is completed and a Back Country designation coordinated with that district.
- 6. <u>City of Rocks</u>: This unique geological area should be protected and managed for recreation purposes. Improved access and facilities should be provided at the area.

The watersheds within the planning area are generally in fair condition. There are some opportunities to reduce the erosion level. Particular attention should be paid to the sandy soil areas where the potential exists for wind erosion. Any areas of this nature which are disturbed should be rehabilitated as quickly as possible. There are opportunities in various locations throughout the planning area to improve the erosion levels caused by water erosion. These opportunities are primarily related to improving the vegetative cover of the soil. Improved vegetative cover should be pursued in the development of various activity plans. An insufficient amount of water quality data currently exists throughout the planning unit. An inventory should be initiated to determine the water quality of the various streams in the planning unit. Based upon this inventory water quality should be improved by reducing the soil surface factor through improving the vegetation on the soil. Secondly, there are some stream channels within the planning area which should be fenced to exclude livestock use in order to improve the erosion level occurring adjacent to the streams. The magnitude of sediment damage occurring within the planning area is relatively unknown. However, damage is suspected to be very minimal. An inventory should be initiated to obtain basic data relative to sediment damage occurring from the National Resource Lands.

The overall objective for the wildlife activity is to provide habitat for the various fish and wildlife species which occur, or are anticipated to occur, on the National Resource Lands in the future. There are essentially two types of mule deer habitat which occur on the National Resource Lands. A relatively small number of mule deer summer on the National Resource Lands. It is anticipated that this number will increase significantly in the future, therefore, additional summer habitat should be provided. There is a relatively large number of mule deer which winter on National Resource Lands. It is also anticipated that the number of wintering deer will increase in the future. Deer winter habitat has been identified as deer winter range and critical deer winter The critical deer winter range are those areas which are currently range. receiving heavy winter use. The objectives on the critical deer winter range are to maintain and improve the current browse composition of these areas, and any brush removal projects within these areas should be limited. Within the winter range areas, the objective should be to increase the quality of the range. This will require coordination between the wildlife activity specialist and the range and watershed specialist on any vegetative manipulation projects. There is a relatively small herd of elk which spends the entire life cycle within this planning area. The objective is to provide adequate food and cover for a herd of approximately 400 animals. It appears that adequate habitat exists at the present time; therefore, the objective can be obtained through coordination with the range activity to insure this habitat is not deteriorated in the future. It may also be necessary to close the winter range area to offroad vehicles between the period of December 15 - March 31 to eliminate harrassment of the animals during their stress period. A small antelope herd exists within the planning area. Evidence indicates this herd at one time was considerably larger than at present. Within those areas identified as potential habitat expansion areas for antelope the limiting habitat factor should be identified and an attempt made to expand the herd. The areas presently identified as antelope habitat should be maintained and the appropriate vegetation to support this antelope herd whould be provided. Sage grouse are an important wildlife resource within the planning area, in which most of the birds live their entire life cycle. The objective is to increase the huntable population of this species within the area. The three key habitat requirements of this species are: strutting and nesting areas, brood rearing areas, and winter areas. The strutting grounds should not be disturbed and adequate sagebrush cover should be maintained within the nesting areas to provide for nesting sage grouse. In the brood rearing areas the key factor is wet meadow areas which provide succulent forage during the summer months. These areas should be maintained and improved. Since the primary ingredient in the sage grouse winter diet is sagebrush it will be necessary to maintain adequate brush within the winter areas to provide for the anticipated population of sage grouse. Upland game birds, including pheasants, quail, mourning dove, Hungarian partridge, and chukars, are also important huntable wildlife species within the planning area. Many of these species are found on National Resource Lands adjacent to the farming areas throughout the planning units. An important part of their habitat requirements can be provided on the National Resource Land by maintaining sagebrush for

escape and winter cover. Therefore, careful consideration should be given to this habitat requirement when considering any vegetative manipulation project. Forbs and grasses are also an important component of the life cycle of the upland game bird species. Consideration of this need should be part of the development of the allotment management plans in those areas which lie adjacent to the developed agricultural lands. There are a number of species and waterfowl and shorebirds which nest along the streams, canals, and reservoirs, in the planning area. The nesting cover should be maintained and improved by limiting livestock use adjacent to these areas and still provide access to water for livestock. The cover may be improved by the establishment of seedings of tall wheatgrass, crested wheatgrass, alfalfa, etc. Goose nesting populations may be increased by providing nesting platforms on Mormon, Thorn Creek, Spring Creek, Pioneer, and Sonners Reservoirs. The effects of public disturbance on these nesting geese should also be monitored and if found to be significant steps should be taken to eliminate or reduce the disturbance. Birds of prey are quite numerous in portions of the planning area. Vegetation which supports the prey species (rabbits, rodents, etc.) should be managed to provide and maintain the prey species habitat. The areas within one-half mile of known eyries should be closed to off-road vehicles during the nesting seasons in order to safeguard against disturbing nesting birds. Nongame wildlife within the planning area can best be managed by providing a diverse vegetative composition throughout the area. The fisheries within the planning unit, although somewhat limited, can be improved by improving the riparian habitat along the streambanks. Some areas along King Hill Creek, Dry Creek, and Clover Creek will require fencing to exclude livestock use. In a more general sort of way, fisheries habitat can be improved by improving the overall watershed conditions to increase the water quality in streams. An intensive survey will also be necessary to determine the fisheries potential of all streams and reservoirs throughout the planning unit.

The range management section of this MFP is much more voluminous than any other section. This should not be interpreted to mean that the level of detail in this section is any greater than in any of the other resource activities. The volume stems from the fact that each grazing allotment is addressed separately, and therefore, a great deal of repetition occurs. It was felt this process would provide a ready reference for activity planning (allotment management plans) which will undoubtedly be prepared before any other activity plans. Three objectives were developed for the range management section: (1) Increase forage production to the estimated poten-(2) Implement management practices on all grazing lands within the tial. planning unit to reach and maintain good range conditions. (3) To provide protection and conservation of the threatened and endangered plants. The key word in the development of recommendations in the range management section is "coordination". Livestock grazing in this planning area has had a greater impact than any other use in the past and will undoubtedly continue to have a greater impact than any other activity which occurs on the land. Additionally, livestock grazing has the opportunity to improve and/or enhance the vegetation which is the key to improving many of the other resources. It then follows that by coordinating the livestock management program with other resource activities significant benefits to multiple

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use will occur. The word "coordination" should also be applied within the range management activity to include coordination with the needs of grazing permittees. Implementation of the allotment management plans is considered the key to attaining the objectives identified above. Management plans should be developed taking into consideration stocking rates, grazing systems, (the principles of rest-rotation grazing should be employed in all allotments not identified under custodial management, and in these instances an attempt should be made to meet physiological requirement of vegetation by varying grazing seasons from year to year), and season of use. Potential production can be obtained through grazing systems, the use of mechanical vegetative manipulation, and herbicides. All three of these practices must be closely coordinated with the other resource activities, in particular wildlife and watershed management. A thorough inventory and mapping should be completed to identify threatened and endangered plant species which occur within the planning area. The physiological needs of any threatened and endangered plant species should be identified and considered in the development of the allotment management plans to protect the species. The development of vegetative manipulation proposals should be closely coordinated with the protection of threatened and endangered plant species.

Charles C. Brithe D/m Mp L. Glather S. P.

UNITED STATES GOVERNMENT	
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To : District Manager, Shoshone	JUL 30 1976
FROM PSState Director	BUREAU OF LAND MANAGEMENT. SHOSHOWE, IDAHO 83352
SUBJECT: Bennett Hills-Timmerman MFF	AM. WH AM. WR ALL EMPLO ZEE INFO-MAIL PKT FILE WITH CONTRACT STATE

Your staff should be commended on the obvious effort that has gone into the Bennett Hills-Timmerman MFP. Generally, the Step I recommendations are clear and to the point with adequate rationale. The multiple use analyses appears to be thought through and very well coordinated. We appreciate the bookkeeping chore required to track conflicts, support needs, and supportive recommendations.

The State Office specialists have reviewed Steps I and II, and their comments and questions are attached. We thought it best to send their comments verbatim. We are not recommending that you make major changes before developing Step III. However, you might consider the following comments when finalizing the MFP.

The sections on range management are lengthy with considerable duplication, many of the recommendations being identical except in different allotments. This approach results in discrete sets of decisions by allotment which should prove useful in subsequent AMP, EIS development. However, it appears the same result could have been gained by stating a recommendation and listing those allotments to which it applies. This would have reduced the bulk of the documents considerably.

We are not certain the recommendations will provide adequate guidance on seasons of use. The recommendations concerning revision of AMP's do not indicate if turnout dates are appropriate or too early, indicating some critical spring grazing has been at the discretion of the range user. It is not clear if later turnout dates are being recommended, grazing systems which would include periodic rest from early spring grazing, or both. Generally, the physiologic needs of key forage species must be considered with active management decisions, and can not be left to the discretion of range users.

A recurrent high percentage of nonuse in an area is often indicative of a lack of forage. It appears you have addressed the over-obligation problem, even though you have no current data showing existing quantities of forage. It is important that stocking rates do not significantly exceed available forage supplies, even where intensive allotment management plans are in effect. With present data, you have addressed maximum numbers of livestock about as straight forward as possible.

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Where small allotments are involved, combining allotments in order to allow for development of AMP's without numerous range improvements seems quite appropriate. This would also preclude creating many very small allotments. In considering the feasibility of combining allotments, the needs of the resource should provide the principal criterion.

Rationale for brush control, seeding, or other land treatments may need to be strengthened. The benefits of such improvements from additional AUM's forage alone may not justify the costs. However, there may be other benefits derived from land treatments that were not discussed in the rationale. Although there are no clear guidelines on benefit/cost applications in AMP's at this time, we will be expected to show a reasonable return on investments of public monies in the AMP/EIS process. It is our understanding that all AMP's will be considered from a benefit/cost aspect in the very near future.

We understand the Bennett Hills-Timmerman MFP will be reviewed by a team from the General Accounting Office. Their emphasis will likely be toward evaluating the merits of the MFP process and product under the new manual procedures. We do not think they will be looking at the adequacy of the planning document for AMP/EIS purposes specifically.

for I. Woodan

Attachment



Wildlife Management

There are no recommendations pertaining to endangered, threatened or sensitive species habitat. Obviously, there are no endangered or threatened species known to inhabit the planning units. There could be habitat suitable for reintroduction if endangered species, peregrine falcons, and a suitability inventory would appear to be in order. The WO is developing a policy similar to Idaho's policy for sensitive species which states BLM will intensively manage habitat for sensitive species habitats the same as we would for endangered or threatened species. Sensitive species are those species previously classified as status undetermined by the Fish and Wildlife Service or species of concern as identified by the Idaho Department of Fish and Game, blue book species as identified by the Audubon Society, etc. In these planning units, the spotted bat (Euderma maculata), ferruginous hawk (Buteo regalis), prairie falcon (Falco mexicanus), western burrowing owl (Speotyto cunicularia) and longbilled curlew (Numenius americanus) are known to exist and should be considered sensitive species.

Wildlife Recommendation WL-1.2 and WL-1.4: These two recommendations appear to be in conflict unless different areas as denoted on an overlay or somewhere in the planning document are identified. WL-1.2 recommends reducing sagebrush which are shrubs on deer summer ranges while WL-1.4 recommends increasing shrub availability?

Wildlife Recommendation WL-2.5, Multiple Recommendation and Reasons: This recommendation leaves one wondering who administers the National Resource Lands--the BLM or the livestock users? Encouraging a user group (livestock users) to do something when the Bureau has the authority to set livestock grazing turnout dates is not living up to our multiple use management mandate. In this case, WE CAN AND SHOULD MAKE THE DECISION AS TO TURNOUT DATES.

Wildlife Recommendation WL-3.3: Wouldn't be reasonable to assume some interspecific competition between deer and elk presently exists and will increase if both deer and elk numbers are allowed to increase? Therefore, shouldn't we be determining the degree of interspecific competition.

Wildlife Recommendation Objective No. 5: Shouldn't our objective be to <u>intensively</u> manage 59,000 acres of antelope habitat in the two planning units? We are already managing the 59,000 acres.

Wildlife Recommendation WL-5.2: This recommendation is not specific. Sagebrush patches, 2-4 acres in size, randomly distributed really doesn't say much. Sagebrush patches, 2-4 acres in size, per some unit of land measure, would give the manager more guidance such as 2-4 acres minimum per 20-acre tract, 40-acre tract, 80-acre tract, etc. It is recognized that each area is different and, therefore, difficult to make a minimum recommendation; however, some minimum standard would be desirable.

Wildlife Recommendation WL-6.2: Do we want to exclude <u>all</u> livestock use from all the wet meadows and spring areas as identified on the URAs?

Complete exclusion can result in the vegetation becoming so rank in a few years, sage grouse will not use it. Moderate livestock grazing of some spring and wet meadow areas in the late summer can be beneficial.

Wildlife Recommendation WL-7.1, Multiple Use Recommendation: This multiple use recommendation sounds good but do we know how to selectively control sagebrush within a 2-mile radius of strutting grounds in such a manner that will not adversely impact present and future nesting sage grouse populations? Site guideline reference and/or general criteria in the "reason section" for accomplishing this.

Wildlife Recommendation WL-8.1 and WL-8.2: These two recommendations are slightly ambiguous. WL-8.1 states to exclude livestock grazing from pheasant habitat areas. WL-8.2 states no more than 60% livestock grazing utilization in upland gamebird areas. Ring-necked pheasants are upland gamebirds. Consider making the pheasant recommendation separate from mourning doves, Hungarian partridge and chukars as was done with sage grouse and drop the term upland gamebirds. Also, there are no recommendations specifically for rabbits. Cottontail rabbits are a game animal in Idaho. There are areas in the two planning units that are probably popular rabbit hunting areas? Shouldn't some type of upland game management recommendation be made for this resource and popular rabbit hunting areas identified?

Wildlife Recommendation WL-9.1, Multiple Use Recommendation: This recommendation does not say what you mean. Selectively exclude livestock means some livestock will be excluded and some will not. Selectively exclude livestock grazing from some waterfowl nesting areas and not others is what you are trying to say. Did you consider providing water lanes where necessary to achieve livestock grazing management objectives while reducing the impact of livestock grazing on waterfowl nesting habitat?

Wildlife Recommendation WL-10.2: Human disturbance will affect the breeding behavior of geese. Again the point is the <u>degree</u> of disturbance. Consider the following recommendation: if such disturbance results in reducing nesting success and/or brood survival, steps shall be undertaken cooperatively with the Idaho Department of Fish and Game to reduce the disturbance to tolerance levels.

Bennett Hills

Don't think any of the recommendations to plow, seed, spray, etc., to produce additional forage will fly. A 2,500 acre brush removal and seeding at \$15/acre will cost \$37,500 at life expectancy of 20 years costs \$1,875/year without discount rates, etc. If it produces 420 additional AUMs at \$4/AUM it equals \$1,680/year. The project just doesn't pay off on this basis alone--we must have some other justification.

Didn't see anything on conversion ratios. How do you propose to handle this? Could a unitwide recommendation be made?

Unitwide-Season of Use

1. Seems to me that the seasonal use problem will not get solved with this recommendation. Operators won't scatter their use out over the period 4-1 to 12-31. They will continue to activate it all in a 1 or 2 month period.

Recommendation should include a maximum number of livestock that could be grazed at one time.

2. Why is this needed; if the season is 4-1 to 12-31, isn't this the same for all livestock. Needs clarification. Are sheep going to stay there in summer like cattle will or do?

King Hill Allotment, Multiple-Use Recommendations

- a. The term "when least economic impact will occur to the allottee," is pretty difficult to come to grips with. The reason for combining allotments is because of the needs of the resource. If the resource is not being damaged, we have no reason to combine if it is there we can't wait until "the least economic impact" will occur.
- 2. c. The recommendation and reasons don't seem to agree. The season indicates the AMP OK "if part of the allotment is designated as back country." How do these fit together? How does back country designation help?

Dempsey Allotment

What is the spring growing season? Identify dates.

Multiple Use Recommendations: 2 - "Do not allow" infers operators will be applying for change, whereas reasons state this will cause economic hardship.

Indian Allotment

Rationale-reference to Instruction Memo 75-407. What about 43 CFR 4111.4-3 thats been around a lot longer.

Wood River

Picabo Cattle, Recommendation RM1,2.4: At what point in time will the proposed benefits be analyzed? What are the proposed benefits? If more info is needed what is it? And how will it be obtained?

Do benefits equal or nearly equal costs on land treatment projects? The rationale indicates treatment is for forage production only.

Richfield

RM 2-2 recommendation not clear. Something missing.

Truck Allotment

Don't think the proposed grazing formula will meet the multiple use recommendation. An allotment is grazed two years in a row during the growing season. No rest for seedling production.

Timmerman Hills Sheep

Apparently, this allotment is used only by sheep. I don't know when seedripe is but I suspect its not before 7-25 which means that the allotment is grazed 3 out of 4 years during the growing season. Don't believe this system will improve conditions. If allotment already in good condition, it may maintain it at about that but no improvement.

Wont' meet any of the objectives.

RM 2.4: Will the grazing system as proposed accommodate cattle without a significant adjustment.

2.4. What are the proposed benefits that will result? When will you know if they can be realized?

Lands

Generally, I think this effort is very well done and the District deserves to be complimented.

Recommendations are brief and clear. Rationale is not mixed with recommendations.

If District personnel continue to follow this procedure in the formulation of Districtwide objectives and goals, I think they will produce good MFPs.

s/Frank Pallo

Cultural Resources

In general, the approach utilized for cultural resources is very good (I'm somewhat biased, of course, since I assisted in the development of this MFP).

The rationale and straightforward presentation should be an excellent model for other MFPs to follow.

s/Richard Harrison

Minerals - Ed Barnes

Step 1, M-1: Geothermal potential should be considered better than low!

M-1.1, <u>Recommendation</u>: "Retain leasable mineral rights..." is very good, but is a matter of policy, under the jurisdiction of USGS, so is not a matter subject to BLM planning decisions.

<u>Rationale</u>: Very good, but again is a broad statement of policy, and lends little to a planning effort.

<u>MU Analysis:</u> Generally, a weak statement which tends not to support the recommendation. However, the fault lies in the fact that the recommendation has no specific substance.

M-1.2, <u>MU Analysis</u>: Much too general. Does not get down to specifics. Where and what are the conflicting resources that need what protection?

<u>M-U Recommendation</u>: In some rare instances oil and gas leasing of private land should not be contemplated-but only in highly developed areas with exceptionally valuable improvements, etc. Also, only in very rare instances if ever would it be incumbent upon us to contact the surface owner. Respective rights are well established. The surface owner would always find objections, but it is not up to him to determine whether the government should exercise its rights with respect to government-owned minerals.

By pointing out areas of conflict and making a decision in their respect, you are accomplsihing the real objective of planning. I question the necessity or advisability of excluding "eagle areas," unless endangered or threatened species have been identified.

M-2.1 Very Good.

M-2.2 Very Good.

M-2.3 Somewhat self-serving, and not really a planning matter. However, need for a program has to be developed. Maybe there is no other way, but basically it is a programming matter rather than planning.

M-3.1 Very Good.

M-3.2 Very Good.

M-3.3 Too general.

M-3.4 Too general. Same comment as under M-2.3.

The whole effort in Minerals is very good, considering the difficulty of coming to grips with many intangibles.

W-2.1: Water Quality. What is needed to set up the 16 WQ monitoring stations - equipment, MM, etc.

WL-5.1: What is the potential of forbs on an ecological site; it could be quite a bit less or more than 15-20 percent of the vegetation. Admittedly, increase of forbs would increage antelope range, but is that what should be in the area. I think we have to look at it from "what would be there if vegetation was at its potential" and go from there.

This is a very good job.

s/Vern Webb

Recreation - Bennett Hills-Timmerman Hills

<u>R-1</u>: Expand fishing opportunities. . What are the present estimated recreation days of fishing use? What does the increase to 50,000 visitor days represent?

Will increasing the number of catchable fish automatically increase the visitor days or are there other items of need such as improved access by road or trail, facilities to keep people on the area longer, more boat ramps, etc., even though this is partially covered in R-10, some indication is needed as to the situation unitwide, and cross reference between the two objectives.

The above would probably also apply to objective R-2 as it relates to an increase of hunting opportunities. As habitat is improved conditions will also change with regard to access, facilities etc.

There is a possibility that some objectives might have been combined. For instance objectives R-1, R-3 and to some degree R-10 are aimed at improving water based recreation opportunities.

In general, for recreation the measure of water quality is to maintain levels acceptable to water contact activities--these standards are discussed in the publication "Report of the Committee on Water Quality Criteria," Federal Water Pollution Control Administration, April 1968. This gives the manager a more definitive description of standards to measure against.

The section is objective to meet visual resource management objectives is a good start--in the multiple use recommendation it should be stated that <u>all</u> actions that are anticipated to occur in a particular piece of land should be subjected to the visual contrast rating to determine a way to get the job done with a minimum of landscape disturbance.

The Registered Natural Landmark is a National Park Service designation. How would you propose to manage the area as a BLM designation - research natural area, outstanding natural area, back country, primitive?

Objective R-12 - is there any options to establishing a rest stop area - State Highway Dept.?

It appears some of the objectives are recommendations that could be consolidated under fence objectives.