Mary Jones/LSRD/ID/BLM/DOI
08/31/2006 12:31 PM

To Kimberly Werven/LSRD/ID/BLM/DOI@BLM
cc
bcc
Subject Fw: RMP Comments

Mary Jones
Writer/Editor
Bureau of Land Management
Lower Snake River District
3948 Development Avenue
Boise, ID 83705
208-384-3305
----- Forwarded by Mary Jones/LSRD/ID/BLM/DOI on 08/31/2006 12:31 PM -----

Karen Steenhof/BRD/USGS/DOI@USGS
08/31/2006 12:22 PM

To srbp@contentanalysisgroup.com
cc Kate Kitchell/BRD/USGS/DOI@USGS, john_sullivan@blm.gov, Mike O'Donnell/LSRD/ID/BLM/DOI@BLM, Mary Jones/LSRD/ID/BLM/DOI@BLM, mkochert@usgs.gov@USGS
Subject RMP Comments

Thank you for the opportunity to comment on the Snake River Birds of Prey National Conservation Area Draft Resource Management Plan and Environmental Impact Statement (ID-111-2006-EIS-1740). Although we support the actions outlined in the Preferred Alternative, we were surprised that the section on "Desired Future Conditions" did not address raptor populations. Considering that the purpose of the legislation establishing the NCA was: "to provide for the conservation, protection, and enhancement of raptor populations…," it seems that the Resource Management Plan should have goals for enhancing and maintaining the raptor populations: whether to increase them to new levels, whether to maintain them at current levels, or whether to keep them from declining below some threshold. For example, the number of Golden Eagle pairs in the NCA has declined from levels in the early 1970s (page 2-15 and 2-16 of the RMP), we feel that a DFC for the NCA would be to increase the number of eagle pairs to the level of the early 1970 or it could be to prevent any further declines. Although the plan (page 1-14) calls for increasing the number of nesting trees, this action does not address the needs of the majority of raptors that nest on cliffs (e.g., Prairie Falcons).

We were surprised and concerned that the section on monitoring in Chapter 5 did not call for any monitoring of raptor populations. Because the NCA was legislatively established to protect the unique aggregation of raptors, it seems logical that the status and health of the raptor populations should be assessed periodically. Much of the RMP is predicated on the concept that restoring vegetative communities to desired conditions will ensure sustained raptor populations. This is a good concept, but restoring native plant communities will not guarantee sustained raptor populations. Habitat is only one of many factors that affect raptor populations. For example, human activity and disease (West Nile virus and avian influenza, for example) could affect raptor populations even when the habitat is good. Also some raptors could persist even though

the habitat does not improve. Our research in the NCA has shown that some Golden Eagle pairs continue to occupy territories and produce young even thought the habitat in their home range is seriously degraded.

The notion that restoring native plant communities will result in sustained raptor populations is a good hypothesis that needs to be tested through adaptive management. In 1999, managers, specialists, and researchers participating in the Snake River Birds of Prey National Conservation Area Habitat Restoration Workshop at the Sagebrush Steppe Ecosystems Symposium (Entwistle, P.G., A.M. DeBolt, J.H. Kaltenecker and K. Steenhof. eds. 2000. Proceedings: sagebrush steppe ecosystems symposium. Bureau of Land Management, Boise, Idaho.) recommended that to measure whether landscape level goals are being achieved in the NCA, managers must define and monitor "success" at all trophic levels (see Question 5, page 139 of Entwistle et al. (2000). Recommended types, methods, and frequency of monitoring were outlined in the Symposium proceedings (pages 139 and 140) as well as in USDI 1996 (U.S. Department of the Interior. 1996. Effects of military training and fire in the Snake River Birds of Prey National Conservation Area. U.S. Geol. Surv., Biol. Res. Div., Snake River Field Sta, Boise, ID.). The monitoring section in Chapter 5 does mention monitoring the 2 main prey species; we will be curious to see the specifics of the proposed approach, as prey monitoring can be very expensive.

We were pleased to see that the Preferred Alternative did not include a new power line corridor in Owyhee County. As we noted in our earlier comments, the route south of the river has important remnant shrub habitats, is within 5 km of known Sage Grouse leks, and has important visual resource values.

Our specific comments below focus mainly on the sections about wildlife. Some of our comments reflect the fact that new information has become available since the plan was actually written.

Page 1-1. The text refers to the 1996 NCA Management Plan. The reference list shows the management plan as having been published in 1995. The copy we have in our office shows 1995 not 1996 as the publication date.

Page 2-12. Cite Steenhof et al. 2005 (**Steenhof, K.**, M. R. Fuller, M. N. Kochert, and K. K. Bates. 2005. Long-range movements and breeding dispersal of Prairie Falcons from southwest Idaho. Condor 107: 481-496.) in support of statements in the first paragraph of column 2. You might choose to include more specific information from that reference.

Page 2-13. The 1975 survey for Prairie Falcons was not complete so it is inappropriate to calculate densities for 1975. More complete surveys were conducted from 1976-1978 and were reported in the 1979 Special Research Report to the Secretary of the Interior. Any comparisons of abundance within the NCA and upstream should be calculated from data in the 1979 report not the 1975 report. To compare relative abundance within the NCA, the best source of information is Kochert and Steenhof 2004a—see summary in Appendix 7. We suggest you change the wording of the paragraph in column 2 at the top of page 2-13 to: "Between 1976 and 1978, surveys found significantly higher densities along 78 miles of the Snake River from Guffey Bridge to Indian Cove Bridge than in 36 river miles from Hammett, Idaho to the Malad River (USDI 1979, page 56).

2-16. Change "Half of the 40 known nesting areas" to "Half of the 40 known nesting territories"

Page 2-18. Instead of citing USDI 76 in support of the statement that Piute ground squirrels are the most common prey of red-tailed hawks, cite one or both of these articles, both of which contain data from more years:

> Steenhof, K. and M.N. Kochert. 1985. Dietary shifts of sympatric buteos during a prey decline. Oecologia 66: 6-16.
>
> Steenhof, K. and M.N. Kochert. 1988. Dietary responses of three raptor species to changing prey densities in a natural environment. Journal of Animal Ecology 57: 37-48.

Page 2-18 If you really want to identify all osprey pairs nesting in the NCA, you should not omit the pair that attempted to nest on the Priest Ranch in 2005 and 2006.

Page 2-20. The first sentence of the section "Key Raptor Prey Species" says: "Raptor prey species are not as varied…" as varied as what? Our database shows that NCA raptors take more than 150 species of prey from several different orders.

Page 2-20. Change "occupation of nest sites" to "occupancy of nesting territories"

Page 2-21. The report refers to a "lack of Prairie Falcons nesting" along the Snake River east of Hammett. Although nesting densities are not as high there as in the NCA, Prairie Falcons are known to nest in that stretch.

Page 2-23 First Paragraph. Figure 2.7 is cited in support of a statement that kangaroo rats are eaten by a variety of predators in the NCA, but Figure 2.7 has nothing to do with predator diets. The second paragraph states that deer mice are eaten by all NCA raptors. We do not have diet data for all raptors; it would be more appropriate to say deer mice are eaten by most NCA raptors. The citation for this statement is Fig. 7 (I assume this is supposed to be 2.7?) and is again inappropriate because Fig. 2.7 displays no information on food habits of raptors. We suggest that Figure 2.7 be removed from the RMP because it provides no useful information to readers. Counts of mice and kangaroo rats along spotlight transects are meaningless without accounting for detectability issues using a program like Program DISTANCE.

Page 2-25. The cross-reference to "Key Raptor Prey Species" appears to be a wrong number.

Page 2-30. Why not use a more recent report than Sallabanks 2002? Please use the term occupied instead of "active."

Page 2-30. Juvenile plumage refers to feathers worn by eagles in their first year of life. Eagles do not breed when they are less than 2 years old. Strike juvenile and keep the term subadult plumage.

Page 2-31. Define what is meant by "breeding activity." Nesting activity certainly occurs much later than May in most latitudes (including Idaho). Nesting activity barely begins in October in

southern latitudes.

Page 2-41. Change "fairing" to "faring"

Page 2-35. Rotenberry is misspelled twice.

Page 2-35. The legend for Figure 2.8 has misspelled and incomplete terms.

Page 2-36. Bechard 2003 is not in the list of references.

Page 2-36 Please provide a reference for the statement that long-nosed snakes are a very common prey of Red-tailed Hawks in the lower canyon of Sinker Creek. Our food habits database shows only 2 individual long-nosed snakes from a nest in that area (Jacob Reuben), representing 2% of the 90 prey items collected at that site.

Page 2-37 Please provide a reference for the statement "every 10-15 years, when the NCA receives higher than average winter/spring moisture, making grass cover abundant, the owls may become common to abundant breeders." We are not aware of a correlation between precipitation and short-eared owl abundance. The most complete owl surveys were in the early 1990s, which were all drought years.

Page 2-37 Please provide a reference for the statements "it is unlikely…that voles play a major role in short-eared owl densities away from agriculture or riparian areas. Density of vegetation is more likely the key to their nesting in upland areas." The 3-fold difference in Short-eared Owl density during the 1990s appeared to be related to vole abundance.

Appendix 5. Piute ground squirrel is misspelled.

Appendix 6. The data presented are likely accurate for the period 1970-1994, but earlier laying dates and later fledging dates have been recorded for many species in the 12 years since 1994. For example, in 2006, a brood of Swainson's Hawk nestlings within the NCA did not fledge until 8 August in 2006. Some Prairie Falcons lay eggs in late February. We can provide an updated table of hatch dates by species if you want.

Appendix 7. Why is the paragraph at the bottom of the table in the appendix and not in the main text? The paragraph refers to Fig. 2, which I could not find. Should it be 2.2? It seems the explanation of that figure would be fit better with the material on page 2-13.

Karen Steenhof and Michael N. Kochert
USGS Snake River Field Station
Forest and Rangeland Ecosystem Science Center
970 Lusk Street
Boise, ID 83706

karen_steenhof@usgs.gov
FAX: 208-426-5210

Snake River Birds Of Prey NCA
C/O Content Analysis Group
PO Box 2000
Bountiful UT 84011
srbp@contentanalysisgroup.com

Bureau of Land Management
Boise District Office
John Sullivan, Mike O'Donnell
3948 Development Ave
Boise ID 83705

To Whom It May Concern:

Purpose- Specific Recreation Experience
The Snake River Birds of Prey National Conservation Area is a unique area because of the raptor and raptor prey populations. We respect the NCA and its purpose of the preservation of raptor habitat. Also unique to this area are the rock formations along the cliffs that offer an opportunity for technical rock crawling by 4x4 vehicles that is not found anywhere else in southwestern Idaho. One particular canyon offers a significant amount of moderate to extreme technical rock crawling because of the uniqueness of its volcanic rock formations (Look at attached map of exact location of this specific trail). This canyon trail has been used responsibly, without adverse consequences, by 4x4 enthusiasts for approximately fourteen years and is a quality rock crawling trail that the 4x4 community value greatly.

Route Designation
We of the 4x4 community would ask to designate this trail for technical 4WD/Rockcrawling as presented in the Transportation Table 3.3 Route Designation Criteria-Current Use. This trail currently appears on the Road Network Transportation Map 1 as an inventoried trail. In alternative D, which is preferred, vehicle access would be managed according to the following OHV Area Designations (Transportation Map 5) that would be limited to designated routes only.

A key feature of this trail is that we can maintain the Roaded Natural setting that is defined as "landscapes partially modified by roads, but not in a way that overpowers the natural landscape features". Our particular Technical Sport of Rock Crawling does not require actual maintained roads, but leaves the landscape essentially in its natural condition. The only actual roads would be access and exit roads that are currently on the Road Network Transportation Map 1.

Designation of this trail is the most positive way to allow the 4x4 community a unique recreation experience. We would refer you to the section 4.2.16 Recreation, How Activities Affect Recreation Management- Direct Impacts- Transportation Area Designations and Route Designation Criteria. "Designating areas as closed to motorized vehicles would have direct adverse effects to motorized recreation. Restricting Vehicles to designated routes would beneficially affect dispersed non-motorized recreation that normally occurs off-road, such as hiking … Application of the route designation criteria within the limited to designated areas will have slight adverse impacts to motorized use in or around areas containing sensitive resources but will have slight beneficial long-term impacts by eliminating conflicts and providing a range of recreation opportunities."

Mitigation and Management of Trail
As in the past, protection and managed use of this trail offers a distinct educational tool for the 4x4 community. The conservation platform of this particular trail adds a humbling theme to a trail ride and surfaces the unique opportunity to educate our users about the landscape and habitat of the National Conservation Area. Managed use of this trail is in compliance with management and use legislation in place as Public Law 103-64.
We agree with and support the conservation, protection, and enhancement of raptor populations. We hold in high regard the efforts to protect habitats and the natural and environmental resources that are stated in the NCA enabling legislation. We would suggest mitigation and management of this canyon trail as follows:

1. Use of the trail would not be in the season of high fire impact.
2. Use of the trail would not be used during known raptor nesting periods.
3. Limitation of the number of vehicles that are on the trail during each visit.
4. Agree to limitation to seasonal use.
5. The 4x4 community would provide trail maintenance as needed, under the guidance provided by the BLM.

We as the Idaho State 4x4 Association would encourage the administrators of the Snake River Birds of Prey NCA to consider our comments and include them in the RMP.

Sincerely,

Bill Taylor
President
Idaho State 4x4 Association

Nate Davidson
Vice President
Idaho State 4x4 Association