

COMMENTS TO CHAPTER 3

We incorporate by reference our comments to Chapter 2 to our Comments relative to Chapter 3. See also additional comments, herein below.

Management Actions Common to All Alternatives (p. 3-11). The DRMP states that "Degraded areas would be restored to shrub/bunchgrass habitat with a forb component and biological soil crust to provide additional habitat for small mammals, invertebrates, lizards, snakes, and birds." However, we know of no evidence that "biological crust" is a necessary, nor even beneficial, habitat requirement for any animal species. The DRMP fails to specify how such "biological crust" will improve habitat for any of the referenced animals. The DRMP also lacks any specificity as to how or where "biological crusts" will be "restored". This lack of specificity precludes adequate opportunity for Black and the public to review and comment upon the planned action.

Fish and Wildlife – Alternative B (p. 3-13). Note: this comment also applies to Alternatives C and D. The DRMP states for this alternative that stocking levels would be determined through the S&G process, and that "additional forage would be allocated for small mammal raptor prey." However, the DRMP lacks any specificity as to how the available forage will be quantified, how the consumptive demand by present and future populations of small mammals will be quantified, and how an "allocation" will thereby be determined. This lack of specificity precludes adequate opportunity for Black and the public to review and comment upon the planned action.

Fish and Wildlife – Alternative B (p. 3-13). Note: this comment also applies to Alternatives C and D. The DRMP states for this alternative that "Forage competition between Piute ground squirrels and livestock would be minimized." However, the DRMP: 1) does not provide the necessary specificity as to what constitutes "minimalizing" competition; 2) does not provide any evidence that concludes there exists any competition between ground squirrels and livestock; 3) does not provide any specificity as to where – what allotments - BLM believes such competition to exist.

Further, in order for species-limiting competition to exist, the consuming species have to be eating the same vegetation, and the vegetation has to be in limiting supply, neither of which the DRMP specifies.

The lack of specificity within the DRMP as to how each grazing allotment is currently operated, as well as how BLM plans to alter such operations, precludes the opportunity for adequate comment by Black and the public. We note, however, that Appendix 9, p. A-35 shows that many of the allotments are grazed in the fall and winter, so that the ground squirrels and other small mammals get "first shot" at the year's yearly forage growth, whether it be perennial or annual species, and many of the allotments are not grazed until after the Piute ground squirrels have completed their annual above-ground activities and aestivated/hibernated. Therefore, in (at least) these circumstances, competition does not exist from the viewpoint of the small mammals, because they are



already afforded unfettered access to the available forage, with absolutely no POSSIBILITY of competition from livestock.

In the case of Browns Gulch Allotment, Black contends that due at least to the abundance of forage, the limitations of utilization upon the grazing livestock, and the associated livestock management practices, no competition between livestock and small mammals exists which in any way limits small mammal populations within the allotment.

Soil Table 3.1. The table summarizes BLM's purported intention to "prevent the potential for future localized soil erosion process on all soils with a moderate to very high soil erosion potential", under all alternatives. However, the DRMP fails to specify what is intended by such objective, and it would appear that BLM intends to prohibit any and all activities that "might" have an impact on soil erosion, no matter how miniscule such impact may be. In other words, it appears that BLM intends to "shut down" literally all on-the-ground activities within the NCA on such soils. Soils Map 1 (p. 124) reports such soils erosion potential to exist on approximately 2/3 of the NCA acreage, including most or all of the Browns Gulch Allotment. This is not rational, reasonable, nor realistic, and in fact conflicts with other management and objectives stated within the DRMP. Unless BLM intends to aerially – and only aerially - attack all wildfires and only aerially seed all restoration areas, allow only aerial recreational pursuits, and require livestock and wildlife only to consume forage if they do so aerially, the "potential for future localized soil erosion processes" cannot be "prevented", even assuming BLM has the legal authority to "shut down" all such activities on all such soils.

Finally as to this point, it cannot be disputed that the very burrowing activity of rodents, including the Piute ground squirrel, has a far greater potential to affect soil erosion than do other activities authorized on the public lands.

Vegetation – Restoration (p. 3-29). The DRMP states that "Efforts would be made to restore native or naturalized vegetation in degraded habitats (i.e. exotic plant or seeded communities) in an effort to help create mosaics of native vegetation...." However, the DRMP does not specify what BLM considers "naturalized vegetation". This lack of specificity precludes adequate opportunity for Black and the public to review and comment upon the planned action. Further, some professionals have suggested that cheatgrass, having been in the United States for more than 100 years, and having shown wide ecological amplitude and the ability to adapt to different climes within the country, should be considered as part of the natural landscape – hence, it is a "naturalized" species.

Livestock Grazing – Alternative B (p. 3-50). The DRMP reports that areas treated under restoration or rehabilitation projects would be rested from livestock grazing until they achieve the desired resource objective. However, the DRMP does not specify what such objective is to be. This lack of specificity precludes adequate opportunity for Black and the public to review and comment upon the planned action.

Black Comments to SNBP NCA
DRMP Page - 12 of 14



Livestock Grazing – Alternative B (p. 3-50). The DRMP reports that after establishment of a restoration seeding, the BLM authorized officer would determine when, how, and to what extent livestock grazing would be returned to the area to ensure long-term maintenance of habitat quality and watershed health. However, the DRMP does not specify by what means BLM will quantify the livestock grazing capacity, or make determinations as to related livestock management actions such as rotation use, etc. This lack of specificity precludes adequate opportunity for Black and the public to review and comment upon the planned action.

COMMENTS TO CHAPTER 4

We incorporate by reference our comments to Chapters 2 and 3 as comments to Chapter 4. To the extent additional comments are necessary, we add the following:

Overall, the entire Environmental Consequences chapter is biased and lacks balance.

One of many examples, and an insight into the biases of the preparers of the DRMP, is found in the highlighted section titled "How Activities Affect Fish and Wildlife Management." A review of this section at page 4-14 reveals that the preparers of the document believe, or want the public to believe, that any and all livestock grazing creates negative impacts (e.g. "collapse of burrows", notwithstanding the fact that ground squirrels plug their burrows themselves, and don't seem to have any difficulty digging their way out each spring), and that livestock grazing has absolutely no positive impact, under any circumstance (i.e. dormant season grazing, rotational grazing, etc). This section fails entire to recognize and report that livestock grazing at appropriate levels and time can reduce the likelihood of recurrent wildfires, which wildfires absolutely have more devastating impacts upon the forage and cover requirements of all wildlife species.

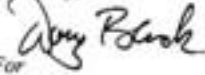
By contrast, the section at page 4-16 attributes absolutely no adverse impacts, either short term or long term, to activities associated with "restoration activities". However, such restoration activities will almost certainly involve rangeland seeding, with rangeland drills and heavy equipment that are most certainly more likely to cause short term "collapses of tunnels" and disturbance of surface soils. Likewise, the chemical treatment of areas to reduce cheatgrass and other species will in at least the short term decimate the food base for countless Piute ground squirrels and other small mammals using the immediate area. In the case of Alternative D, this will likely entail 230,000 acres of habitat over 20 years (an average of 11,500 acres per year), with obvious short- term and possible long-term adverse impacts to the prey base populations.

The entire Chapter is full of such obvious bias and lack of objectivity. The DRMP also fails to specify and fully discuss the short term and long term impacts upon the raptors as a result of predictable, at least short term, declines in prey base populations and their habitat as a result of "restoration" activities. This lack of specificity precludes adequate opportunity for Black and the public to review and comment upon the planned action.

Black Comments to SNBP NCA
DRMP Page - 13 of 14



Thank you for the opportunity to comment to the DRMP. Please keep us informed of all additional opportunities to participate in this process.

Sincerely,

For
Joe Black and Sons

Black Comments to SNBP NCA
DRMP Page - 14 of 14



BOP 13

From: Jenifer Nordstrom [jnordstrom@cableone.net]
Sent: Thursday, August 31, 2006 7:34 PM
To: srbp
Subject: Snake River Birds Of Prey RMP DEIS

Attached to this email are comments from the Western Watersheds Project, Inc. regarding the Snake River Birds of Prey National Conservation Area RMP DEIS. Please acknowledge receipt of these comments. A hard copy will be also be sent via the US postal service.

Thank you,

Jenifer Nordstrom

WWP

9/1/2006





Western Elmore County Recreation District
Enriching Families & Building Community

P.O. Box 1347 – Office: 140 North 3rd East
Mountain Home, Idaho 83647
Phone 208-580-2377 / Fax 208-580-5517
www.weecrd.gov.org

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BOISE DISTRICT

2006 AUG 30 AM 1:46

Doug Belt, President Mollie Marsh, Vice President Dee Pate, Director

Bureau of Land Management
ATTN: John Sullivan
3948 Development Ave.
Boise, Idaho 83705

RE: Land use between Canyon Creek and Grand View Rd.

8/29/2006

Dear Bureau of Land Management,

The Western Elmore County Recreation District supports the use of land between Canyon Creek and Grand View Rd, Elmore County, Idaho for outdoor recreation. We feel that any recreational facilities which enhance the quality of life of the local citizens is a benefit to the community. Therefore, we urge you to consider continued use of this area for recreation purposes.

Thank you for considering our input.

Sincerely,

A handwritten signature in black ink, appearing to read "Doug Belt", is written over a light blue horizontal line.

Doug Belt
President of the Board of Directors
Db/ts



Military Affairs Committee

205 North 3rd East • Mountain Home, Idaho 83647 • (208) 587-4334

RECEIVED AT
BOISE DISTRICT
2006 AUG 30 AM 1:51

August 30, 2006

John Sullivan
NCA Manager, BLM
3948 Development Ave
Boise, Id 83705

Dear Mr Sullivan,

The Military Affairs Committee is composed of approximately 100 City of Mountain Home Chamber of Commerce members all with the same goal of protecting and promoting Mountain Home AFB and it's longevity in Idaho.

We support the proposed establishment of an Off Road Vehicle Park at the old gravel pit on Grand View Highway. The area is extremely well located in close proximity to Mountain Home AFB and has been used for years as an unofficial recreation area for the airmen and their families that live and work on Mountain Home AFB. We highly recommend that BLM not close this area to the public, but work with Elmore County and the many recreation users to keep this unique recreation opportunity available. In addition, to the men and women on Mountain Home AFB, it is an excellent area for use by all that live in the surrounding area. It has some very natural trails and terrain that makes it an ideal place for Off Road Vehicle use.

Sincerely,



Terry Turner, Chairman
Military Affairs Committee

1st Endorsement:
Concur



Alan Bermensolo
366FW Representative to
Air Combat Command Commander's Action Group

Committee of Mountain Home Chamber of Commerce



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2006 AUG 30 AM 1:42



www.wildidaho.org

Conservation League
PO Box 844, Boise, ID 83701
208.345.6933

John Sullivan
Snake River Birds of Prey Manager
BLM, Boise District
3948 Development Ave.
Boise, ID 83705

August 30th, 2006

RE: Additional Idaho Conservation League Comments Regarding the Draft Snake River Birds of Prey Resource Management Plan

Dear John,

The attached comments are concerns specific to the Idaho Conservation League, which were not incorporated into the jointly prepared comments submitted by the Idaho Conservation League, The Wilderness Society, and American Rivers. Please consider these as separate, additional concerns of the Idaho Conservation League not expressed by The Wilderness Society or American Rivers.

Once again we thank you for considering these additional comments. We look forward to continuing to work with the BLM on this project and others in the future.

Sincerely,

Bradley Smith,
Conservation Assistant

Additional Idaho Conservation League Comments Regarding the
Draft Snake River Birds of Prey Resource Management Plan

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STATE OF IDAHO

DEPARTMENT OF AGRICULTURE

August 28, 2006

JAMES E. BISCH
Governor
PATRICK A. TAKASUGI
Director / Secretary

Snake River Birds of Prey NCA
C/O Content Analysis Group
PO Box 2000
Bountiful, UT 84011-2000

BOP 17

To Whom It May Concern:

The Idaho State Department of Agriculture (ISDA) appreciates this opportunity to comment on BLM's Snake River Birds of Prey National Conservation Area Draft Resource Management Plan and Environmental Impact Statement (draft RMP). ISDA congratulates BLM's effort to update the Birds of Prey NCA RMP and give new management direction. ISDA's comments will focus on the thoroughness and accuracy of the information in the draft RMP, particularly as it relates to rangeland management.

CHAPTER 1

1.5 Planning Issues

The draft RMP, on page 1-13, states that the plan will address the need for boundary changes to enhance the public's ability to use the NCA and BLM's ability to manage the area. Though ISDA recognizes BLM's ability to recommend boundary changes to Congress through the RMP both for users and administrative convenience, we caution BLM in its approach to the proposed changes. On page 3-45, the draft RMP states that the current boundary was established through negotiations with individual landowners. Under the descriptions of the alternatives C and D, the draft RMP makes no mention of an effort to consult with landowners on this issue. The RMP in its current form does not analyze how changing the boundary to increase the size (Alternatives C & D) of the NCA will impact the value of the private land and the change of management of BLM lands from a multiple use to the purpose identified in the law that established the NCA. ISDA strongly suggests that these cumulative impacts be analyzed in the final RMP.

CHAPTER 2

2.2.7 Soil Resources
Condition and Trends

On page 2-40, the draft RMP states that native vegetation is being altered and replaced by less desirable species. This is a very broad claim and difficult to measure on a landscape level. Is this a general observation or are there studies in the NCA to substantiate this claim? ISDA suggests clarifying where this information comes from.

Birds of Prey NCA Draft RMP, ISDA Comments, Page 1 of 5

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BOP-17

2.2.8 Upland Vegetation Livestock Grazing

Page 2-42 makes oversimplified statements regarding livestock grazing. It states, "...late spring grazing can prevent bunchgrasses from completing their normal growth cycle" and thus lead to degradation of the seeding. Though this can happen, it depends on the growth cycle of the particular bunch grass, timing of precipitation, grazing intensity, type of livestock, etc. In other words, late spring grazing will not always prevent bunchgrasses from completing their normal growth cycle or automatically lead to failure of the seeding. ISDA recommends that the final RMP recognize such variables rather than make generalized statements.

Upland Native Plant Communities

Page 2-46 states that heavy livestock use may result in mechanical damage to sagebrush and allow root-sprouting species such as rabbitbrush to increase. Though this may happen, if grazing allotment standards are being followed and S&G's are administered correctly, livestock will not damage sagebrush so long as other forage is available. Unless the BLM can cite specific examples of where livestock grazing is producing such results on the NCA, statements such as these should be deleted.

Exotic Plant Communities

On page 2-47, the draft RMP states that livestock consumption of cheatgrass may result in reduced soil productivity. Does cheatgrass deplete soil carbon and nitrogen more with the presence of livestock? ISDA suggests the final RMP cite where this information comes from. It should also be acknowledged here or in the upland vegetation section that livestock grazing on cheatgrass can prevent cheatgrass from seeding if grazed at the right time, thus enabling native grasses an opportunity to establish themselves.

CHAPTER 3

3.2.8 Upland Vegetation

Alternative B on page 3-31 and Alternative D on page 3-32 state, "...however, Sandberg bluegrass dominated areas would receive additional management attention in order to reduce livestock impacts to Piute ground squirrels." Though the environmental consequences to the additional Sandberg bluegrass management are described in section 4.2.8, impacts to livestock grazing in this section are not adequately addressed. Section 4.2.14 also does not address the impact to livestock grazing when additional management will be implemented to reduce impact to Piute ground squirrels. ISDA suggests that an impact statement be added in section 4.2.14 to address the impacts that are identified in alternatives B and D.

3.2.14 Livestock Grazing

There are some confusing aspects about livestock grazing closures and seasonal grazing restrictions in the description of alternatives in Chapter 3.

Birds of Prey NCA Draft RMP, ISDA Comments, Page 2 of 5



BOP-17

Alternative B on page 3-49 states that 3,400 acres at Kuna Butte would be closed to grazing and an additional 1,300 acres along the Snake River would have seasonal restrictions to reduce conflicts with spring recreation. Under Alternative D, Kuna Butte would be grazed only for fuels and weed reduction on an as-needed basis as it has been classified as chiefly valuable for purposes other than grazing (pg. 3-50). More information is needed here to justify these actions. First, ISDA suggests the BLM explain why seasonal restrictions on 1,300 acres are put on the Snake River in Alternative B and not in Alternative D. If this restriction is not in the preferred alternative, is it really necessary have it be a part of another alternative? Second, ISDA suggests that BLM disclose how it came to the determination that Kuna Butte was found to be "chiefly valuable for purposes other than grazing." Why are "recreation, special status plants, and cultural resources" ranked above livestock grazing as far as their value on that allotment?

Under the description of the "Livestock Grazing" portion of the alternatives in Chapter 3, ISDA is concerned with 10 year average time areas would be rested from livestock grazing in areas treated for restoration or rehabilitation (pg. 3-50). Though the draft RMP states that this 10-year average is used for purposes of analysis, ISDA feels that it is unnecessary and inappropriate to use this 10-year average even for purposes of analysis. The draft RMP even acknowledges that this average is significantly longer than would normally be used. Instead, ISDA suggests the RMP delete this unsubstantiated 10-year average and use adaptive management for analysis purposes to determine when livestock grazing can continue on land that has been restored or rehabilitated. Restoration and rehabilitation projects can be extremely variable in their effectiveness and success depending on climate, soils, quality of seed, method used, condition of the area being treated, that even attempting to put an average time frame is purposeless. Using adaptive management to determine when livestock grazing should continue will give the BLM and the grazing permittees whom you are impacting more flexibility in making the determination as to when grazing can be initiated.

CHAPTER 4

4.2.3 Fish and Wildlife Assumptions

Page 4-12, in section 4.2.3, assumes that the short term rate of response to habitat restoration would be 5 years for riparian areas and 10 years for upland species. Short-term rate of response to habitat restoration can vary widely depending on goals and objectives, methods used, soils, climate, etc., therefore, making it difficult to give concrete time frames as to when response will be realized. For example, there are numerous instances where changing management on riparian areas can bring about a response within a year of the change. ISDA suggests this assumption be deleted or the final RMP should disclose how these figures were determined.

How Activities Affect Fish and Wildlife Management

The discussion on "Livestock Grazing Management Activities" on pages 4-14 and 4-15 is an oversimplification of the impacts livestock grazing can have on fish and wildlife resources. For example, the last bulleted item of this section on page 4-15 states,

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"Grazing in riparian area can result in habitat alterations from the removal of vegetation, trampling, and ground disturbance." Though it is true that *unmanaged* livestock grazing can have these types of adverse impacts, properly *managed* livestock grazing in riparian areas will not alter fish and wildlife habitat. This same principle applies to the other bulleted items in this section. ISDA suggests that the final RMP recognize that adverse impacts of grazing on fish and wildlife depend on how livestock are managed; therefore blanket statements about livestock grazing should be avoided.

This same issue arises in section 4.2.8 "Upland Vegetation" and section 4.2.9 "Water Quality, Riparian and Wetlands" and will be discussed here.

4.2.8 Upland Vegetation

The discussion on Direct Impacts of Livestock Grazing Management Activities in section 4.2.8 on page 4-58, makes broad generalizations about the adverse impacts of grazing on upland vegetation. These adverse impacts are usually the result of improper grazing strategies. ISDA strongly encourages the BLM to state in this section that these adverse impacts can be mitigated through proper *managed* grazing and the S&G process.

The BLM also needs to be cautious in the literature cited when discussing these adverse impacts in this section. For example, the RMP cites a study by Kimball and Schiffman (2003) to state that livestock grazing may benefit exotic species that are better adapted to grazing at the expense of native species. The Kimball and Schiffman (2003) study may not be applicable to southern Idaho or to every grazing system. The study was performed in California annual grasslands which is a different system than southern annual grassland with regards to biotic and abiotic factors. The researcher also clipped their plants manually rather than use livestock which could make a difference in results. Other studies cited in this section have similar weaknesses and limited applicability. ISDA suggests BLM carefully consider how it uses its literature cited in this section and others, and their limitations.

4.2.9 Water Quality, Riparian and Wetlands *How Activities Affect Water Quality, Riparian and Wetlands*

Section 4.2.9 is also misrepresents impacts of livestock grazing to riparian/wetland areas. There are several key elements missing in the RMP's discussion on how livestock grazing management activities impact on riparian areas and wetlands on page 4-73. The first bulleted item states, "Riparian areas can be affected by grazing in different ways depending on the season of use." How livestock affect riparian areas during a particular season of use, also depends on the class of livestock, grazing intensity, duration, herding practices, other available water sources, etc. For example, even during times of high temperatures, sheep will not congregate in riparian areas if properly herded.

Also, the last bulleted item of that section states, "Management actions that restrict or eliminate livestock use in riparian areas...would have beneficial direct and indirect impacts on riparian and water resources over the long-term." This, again, goes back to the idea of distinguishing between unmanaged and managed livestock grazing. Though it's true that restricting or eliminating would have beneficial impacts, properly managing current numbers of livestock would also have beneficial impacts. There is an abundance of literature and technical references that describe grazing management schemes that

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benefit riparian areas without restricting or eliminating grazing (i.e. BLM Technical Reference 1737-14 1997, Grazing Management for Riparian-Wetland Areas). ISDA suggests this section be rewritten so as to not give the reader the impression that restricting or eliminating livestock grazing from riparian areas is the only way to realize positive impacts. This should also be done in the RMP's discussion on Indirect Impacts of Livestock Grazing Management Activities on page 4-75. Section 4.2.14 "Livestock Grazing" has the same problem on page 4-96 when discussing indirect impact of livestock grazing to riparian/wetland management activities.

4.2.6.1 Special Status Species Livestock Grazing Management Activities

In the discussion on livestock grazing and springsnails, page 4-25 states, "Livestock grazing restrictions and closures would benefit springsnails slightly at the landscape level over the long-term." There is no peer reviewed literature to substantiate this claim. The literature contained in the two Biological Assessment cited in this paragraph have neither quantitative nor qualitative data to support adverse impacts on springsnails from grazing. The alleged threats of livestock grazing to springsnails in this literature are merely presumed. ISDA suggests this paragraph and the paragraph on page 4-26 regarding springsnails and livestock grazing, be rewritten to recognize the limitation of data on adverse impacts of livestock grazing to springsnails; that impacts of livestock grazing on springsnails are not known.

Special Status Animal Species: Alternative C

On page 4-33, under "Livestock Grazing Management Activities," the draft RMP states, "A lack of livestock grazing would result in a general improvement in habitat condition and quality over the long-term, which would be...slightly beneficial for SSA in annual communities." This paragraph neglects to mention the *short-term* benefits to livestock grazing in annual communities, which would not be realized under Alternative C. Page 4-16 states, "Reducing fuels through grading, plowing or intensive grazing along fuel breaks would result in additional short- and long-term impacts" such as preventing fire spread and "thereby precluding native habitat loss." ISDA strongly encourages the BLM to add this language to the aforementioned paragraph on page 4-33.

On page 4-65, the Morsen et al. 2004 reference is not in "References" Appendix 14.

ISDA, again, appreciates the opportunity to comment on the Birds of Prey NCA draft RMP and EIS. If you have any questions about these comments, feel free to contact Kevin Wright, Range Management Specialist, at (208) 736-3073.

Sincerely,



John Chatburn
Deputy Administrator
Animal Industries

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