

**APPENDIX 20. PUBLIC COMMENT LETTERS**

The public comment letters do not include the attachments. Specific comments are included in the comment response Section of Chapter 6. To see the full comments, including the attachments, contact the Boise District BLM (208) 384-3300.

<b>LETTER NUMBER CROSS REFERENCE</b>			
<b>Letter Number</b>	<b>Last Name</b>	<b>First Name</b>	<b>Organization</b>
1	Nielsen	Rep. Pete	House of Representatives State of Idaho
2	Binder	Angelia M.	Mountain Home Air Force Base
3	Reichgott	Christine	U.S. EPA Region 10
4	Cook	Jeff	Idaho Department of Parks and Recreation
5	Swanson	John R.	Individual
6	Whitlock	Clair	Snake River Raptor Volunteers, Inc.
7	Taylor	Bill	Idaho State 4x4 Association
8	Richards	Jeff	PacifiCorp
9	Culver	Nada	The Wilderness Society
10	Steenhof Kochert	Karen Michael N.	USGS Snake River Field Station Forest and Rangeland Ecosystem Science Center
11	Taylor Davidson	Bill Nate	Idaho State 4x4 Association
12	Black	Doug	Joe Black and Sons
13	Nordstrom	Jenifer	Western Watersheds Project
14	Belt	Doug	Western Elmore County Recreation District
15	Turner	Terry	Military Affairs Committee
16	Smith	Bradley	Idaho Conservation League
17	Chatburn	John	Idaho Department of Agriculture



PETE NIELSEN  
DISTRICT 22B  
ELMORE & BOISE  
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HOME ADDRESS  
3885 SOUTH 138 WEST  
MOUNTAIN HOME, IDAHO 83647  
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2006 SEP -1 PM 2:14

COMMITTEES  
EDUCATION  
HEALTH & WELFARE  
JUDICIARY RULES & ADMINISTRATION

House of Representatives  
State of Idaho

8-31-06

To Snake River Birds of Prey NCA  
C/O Content Analysis Group  
P.O. Box 2000  
Bountiful - Ut. 84011

+  
Bureau of Land Management  
Boise District Office  
John Sullivan, Mike O'Donnell  
3948 Development Ave  
Boise - Id. 83705

To Whom it may concern -  
I, Pete Nielsen Representative 22B, do support  
Idaho State 4x4 Associations Request for management of  
Canyon Creek Sand Wash area. I also support their request  
of the Trail at Marble Canyon.

When I first became aware of possible closure to  
now I want to express my thanks to the above BLM  
personnel and give many thanks for their cooperation in this  
matter. Without their help this would be a difficult  
situation.

I have received verbal support from the Elmore  
County Commissioners, Elmore County Western Recreational  
Dist. and the U.S. Air Force, and the Wild West Off Roaders.

Thanks Again,  
*Pete Nielsen*



BOP 2

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**From:** Binder, Angela M Civ 366 CES/CEVA [Angela.Binder@mountainhome.af.mil]  
**Sent:** Thursday, August 17, 2006 12:09 PM  
**To:** ID\_birds\_of\_preymrp@blm.gov; srtp; jack\_g.peterson@blm.gov  
**Cc:** Dugger Pam A Civ 366 FWJAG; Rowland Nathan E Civ 366 CES/CO; Brown Paula Jo J Civ 366 CES/CEVC; Mattoon-Bowden Sheri L Civ 366 CES/CEV; Carl,Rudsen.ctr@mountainhome.af.mil; Hamilton Luaille CIV 366 CES/CERR  
**Subject:** Comments on Draft BOP RMP

Mike O'Donnell and the RMP team,

Thank you for the opportunity to review the Snake River Birds of Prey National Conservation Area Draft Resource Management Plan and Environmental Impact Statement, Volumes I & II, ID-111-2006-EIS-1740, April 2006. In general, the plan was well organized and easy to use. A lot of hard work went into the preparation of this draft and it shows in the quality of the writing and analysis.

Please accept our comments on the Draft RMP and EIS. We hope that they are helpful as you continue to modify and finalize your plan.

<<366 CEV Comments on Draft SRBPA.doc>>

Very Respectfully,

Angela M. Binder  
Chief, Conservation  
366 CES/CEVA  
1100 Liberator St., Bldg 1297  
Mountain Home AFB ID 83648  
(208) 828-6668  
Fax (208) 828-2194  
angela.binder@mountainhome.af.mil

8/17/2006





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 10  
1200 Sixth Avenue  
Seattle, WA 98101

RECEIVED AT  
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2006 SEP -1 PM 2:05

August 30, 2006

Reply To:  
Assn Of: ETPA-088

Ref: 01-056-BLM

Mike O'Donnell  
Bureau of Land Management, Boise District  
3948 Development Avenue  
Boise, ID 83705

Dear Mr. O'Donnell:

The U.S. Environmental Protection Agency (EPA) has reviewed the draft Environmental Impact Statement (EIS) for the **Snake River Birds of Prey National Conservation Area** (CEQ No. 20060220) in accordance with our responsibilities under the National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act. Section 309, independent of NEPA, specifically directs EPA to review and comment in writing on the environmental impacts associated with all major federal actions and the document's adequacy in meeting NEPA requirements.

The draft EIS identifies three action alternatives for managing approximately 483,700 acres of public land in southwest Idaho. The Preferred Alternative (Alternative D) emphasizes the restoration and rehabilitation of all non-shrub areas outside the Orchard Training Area (OTA) to improve raptor and raptor prey habitat, while imposing moderate restrictions on recreation, military training, and commercial uses. Alternative B emphasizes restoring a moderate amount of raptor and raptor prey habitat in addition to those areas affected by emergency fire rehabilitation and fuels management projects. Alternative B would accommodate recreation, military and commodity uses. Alternative C, like the Preferred Alternative, would emphasize restoration and rehabilitation of raptor and raptor prey habitat. However, unlike the Preferred Alternative, recreation and military training would be substantially restricted and livestock grazing preference would be eliminated in order to support a higher level of habitat restoration.

We support the intended goals of the proposed project. In particular, we support the Bureau of Land Management's efforts to manage this area in a proactive manner to conserve, protect and enhance raptor populations and habitats including raptor prey habitats. We understand the need to balance resource uses and assure they are sustainable over the long-term even when some uses may be in conflict. The document demonstrates that raptor conservation, protection and enhancement can be in conflict with recreation, military training and livestock grazing activities in the National Conservation Area. Livestock grazing and recreation activities such as off-highway vehicles (OHV) increase erosion and sedimentation, reduce streambank stability and exacerbate the invasion of noxious species. Military training activities could affect raptors either by directly disturbing foraging behavior or indirectly by causing subtle habitat changes that adversely influence raptor prey. Because Alternative C would provide the most environmentally protective management measures for the National Conservation Area we recommend that BLM select this alternative for implementation.


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We have assigned a rating of EC-1 (Environmental Concerns - Adequate) to the draft EIS. This rating and a summary of our comments will be published in the *Federal Register*. A copy of the rating system used in conducting our review is enclosed for your reference.

Thank you for the opportunity to review this draft EIS. If you would like to discuss these comments in detail, please contact Mike Letourneau at (206) 553-6382 or myself at (206) 553-1601.

Sincerely,



Christine Reichgott, Manager  
NEPA Review Unit

Enclosure





**JAMES E. RISCH**  
governor

**Robert L. Meinen**  
director

**Dean Sangrey, Administrator**  
operations division

**David M. Ricks, Administrator**  
management services division

IDAHO PARK AND  
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August 28, 2006

John Sullivan, Conservation Area Manager  
Snake River Birds of Prey NCA  
C/O Content Analysis Group  
PO Box 2000  
Bountiful, UT 834011-2000

RE: Snake River Birds of Prey NCA Draft RMP/EIS

Dear Mr. Sullivan:

**General Comments**

The Idaho Department of Parks and Recreation (IDPR) reviewed the Snake River Birds of Prey NCA Draft RMP/EIS. This RMP provides the guiding management strategy for the National Conservation Area (NCA) for the next 20+ years.

The IDPR is a duly-established executive department of the State of Idaho. Idaho Code §§ 67-2402(1) and 67-4222(a). The IDPR, acting under the supervision of the Idaho Park and Recreation Board, carries out recreational policies and programs of the State of Idaho. Idaho Code §§ 67-4221 and 67-4222. The IDPR is authorized by state statute to prepare and keep current a "Statewide Comprehensive Outdoor Recreation and Tourism Plan" referred to as "SCORTP," for the protection and maintenance of areas of scenic beauty, recreational utility, historic, archeological, or scientific interest for the enjoyment of the people. Idaho Code §§ 67-4219 and 67-4223(h). Consistent with these authorities, the Department participates in BLM land management planning and project planning to further the public interest in recreational, scenic, and historical/archeological values.

This Resource Management Plan (RMP) is somewhat unique compared to other RMPs. The Snake River Birds of Prey NCA is mandated by its enabling legislation to "provide for the conservation, protection, and enhancement of raptor populations and habitats". This legislation gives BLM more specific direction that the Federal Land Management Planning Act (FLMPA).

We have been involved in the planning process since August 2001. Our staff has provided scoping comments, attended Intergovernmental Coordination Group (ICG) meetings, helped BLM staff, and attended field trips. The IDPR appreciates the public involvement efforts that BLM has made with this planning process. We believe that this will make a better RMP with fewer protests and court challenges.



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We are somewhat concerned with the draft RMP's planning time frame. Scoping for this project started in 2001. The Final RMP may not be approved until late summer or the fall of 2007. A six-year planning period can put the BLM at risk of using outdated information (which we will outline in our specific comments). It is critical for the planning team to review and update the draft information to reflect current conditions in Chapter 2, Affected Environment.

We are also concerned with the draft RMP's proposed implementation. A 20-year time frame for a comprehensive plan is a long time. Natural and social conditions can significantly change in 20 years. Adaptive management requires monitoring. These monitoring reports really determine whether an RMP needs to be amended or revisited.

We are pleased that BLM has finally released a draft RMP. This draft gives the public an idea of what the BLM is looking to do in the NCA for the next 20 years.

### Specific Comments

#### Chapter 2 Affected Environment

On Page 2-3 the draft states, "The Jarbidge Wilderness Area, located in Elko County, Nevada, is the closest PSD Class I designated area." This statement is true for the Bruneau Planning Area, but not for the Snake River Birds of Prey NCA. The Jarbidge Wilderness Area is located 70 miles from the NCA. The Sawtooth Wilderness, which is also a PSD Class 1 designated area, is only 60 miles from the NCA.

Under the Fish and Wildlife section on Page 206, the draft states, "The IDF&G manages navigable waters in the State." The Idaho Department of Fish and Game does not manage Idaho's navigable waters. The Idaho Department of Lands (IDL) is mandated to manage navigable waters. IDL Public Trust Lands are the submerged lands lying below the natural ordinary high water line of navigable streams and rivers within the State. Title to these lands is held in trust and is managed for the public good.

In Section 2.29, Water Quality, Riparian, and Wetlands, the draft references lotic and lentic conditions. Lotic and lentic are technical terms that many members of the general public don't understand. We suggest that the headings be listed as "Lotic (moving water) Condition and Trend" and "Lentic (still water) Condition and Trend".

On Page 2-68 in Section 2.2.16, Recreation Sites, the draft declares that the NCA only has two developed recreation sites (Cove and Dedication Point), however, the draft lists three sites (Cove, Dedication Point and Rabbit Creek). Celebration Park is also another developed recreation site within the NCA, but is managed by Canyon County Parks and Waterways.

In Section 2.2.22.1 Economic Conditions on Page 2-76, draft references Idaho population growth between 2000 and 2003. The United States Census Bureau has released the 2005 census figures and this data should be used to describe the existing conditions.

The Socio-Economic Table 2.5 on Page 2-81 references IDPR's Motorbike/ATV Registration figures from 1998-2003. We have posted our latest registrations figures (2005) on our website at



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[http://www.parksand recreation.idaho.gov/datacenter/recreation\\_statistics.aspx](http://www.parksand recreation.idaho.gov/datacenter/recreation_statistics.aspx). Table 2.5 needs to be updated to reflect the current figures.

Also on this page, the draft states, "Socio-economic Tables 2.5 and 2.6 show that off-highway motorbikes and ATV registrations have had the largest increase compared to snowmobiles (22.7%)". The Idaho snowmobile registration increase has been driven by the non-resident registration requirement. Resident snowmobile registrations increased 10.1% between 1998 and 2002. Resident snowmobile registrations decreased 9.1% between 2001 and 2005. The 2004-2005 snow season was below average that decreased registration sales.

### Chapter 3 – Alternatives Including the Proposed Action

The draft RMP references semi-primitive non-motorized opportunities several times in this chapter, starting on Page 3-55. The NCA does not contain any semi-primitive non-motorized opportunities. The Recreation Opportunity Spectrum (ROS) is defined " as the combination of physical, biological, social, and managerial conditions that give value to a place."<sup>1</sup>

BLM ROS definitions define semi-primitive non-motorized as: "This setting consists of about 2,500 acres lying at least ½ mile from the nearest point of motor vehicle access. The area is predominantly a natural landscape. Where there is evidence of others, interaction is low, and few management controls exist. Activities include backpack camping, nature viewing, back country hunting (big game, small game, and upland birds), climbing, hiking, and cross-country skiing. The experience provides for minimal contact with others, a high degree of interaction with nature, and a great deal of personal risk and challenge."<sup>2</sup>

The bulk of the non-motorized areas within the NCA are in the Snake River Canyon between Swan Falls Dam and Celebration Park. This stretch of river receives powerboat use that diminishes the semi-primitive non-motorized setting. The IDPR recommends that semi-primitive be deleted from the RMP and just use non-motorized to describe these areas.

On Page 3-55 under 3.2.16 Recreation the RMP states, " Recreation activities not specifically mentioned would be evaluated on a case-by-case to determine their compatibility with management objectives." The RMP needs to address Geocaching. This is a recreation activity that is rapidly growing and has the potential to impact the NCA resources. We would be happy to work with the NCA in developing standards and guidelines for geocache use.

Recreation Table 3.1 on Page 3-60 shows that Alternative D would not recommend any Wild & Scenic Rivers (Recreational River) under the Wild & Scenic Rivers Act (WSA). It is our guess that these recommendations were not carried forward under this Alternative because the NCA enabling legislation provides some level of protection. Does the NCA enabling legislation protect the Snake River from additional dam construction? If not, a WSA designation may be warranted for the Snake River.

<sup>1</sup> The Recreation Opportunity Spectrum: A Framework for Planning, Management, and Research by Roger N. Clark and George H. Stankey, U.S. Department of Agriculture Forest Service Pacific Northwest Forest and Range Experiment Station General Technical Report PNW-98 December 1979

<sup>2</sup> [www.nm.blm.gov/auf/ei\\_malpais\\_stand\\_alone/AppendixFinal.mso11-12-01.pdf](http://www.nm.blm.gov/auf/ei_malpais_stand_alone/AppendixFinal.mso11-12-01.pdf)





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In the Transportation Section 3.2.18 on Page 3-66 outlines the transportation options offered under Alternative D. This alternative closes 4,400 acres to motorized use, sets a route density standard of 2 miles per square mile, and designated 428,000 acres as limited to designated routes for motorized vehicles. Is the route density standard an overall standard for the NCA or is it broken into different areas?

Some areas in the NCA currently have more than 2 miles of road per square mile. We are concerned that this standard could be used to prevent motorized access. In general, the IDPR is supportive of eliminating duplicate routes or dead-end routes that don't lead to a recreation destination. We encourage the NCA to work closely the National Guard, State agencies, Counties, and the public to develop a travel plan that provides adequate motorized access.

Alternative D would create up to 20 miles of non-motorized trails and Alternative C would create up to 40 miles of non-motorized trails over the lifetime of the plan. We assume that the additional mileage is needed because of the additional closed areas under Alternative C. The IDPR supports the creation of additional non-motorized opportunities.

Economics Table 3.1 on Page 3-74 outlines additional recreation facilities to be created during the lifetime of the plan. Alternatives C and D creates the most recreation facilities while Alternative B creates fewer recreation facilities. We support Alternative D is this matter, but, this RMP should not limit recreation facility development in other areas of the NCA as the needs arise over the next 20+ years.

#### **Chapter 4 Environmental Consequences**

We focused our review of this chapter on the Recreation subsection 4.2.16 starting on Page 4-101. For the most part, we agree with the draft RMP conclusions, but some items need updating.

The draft assumes that recreation use will increase in correlation with the regions population growth. Recreation use may or may not be in correlation with population growth. For instance, ATV use has greatly outstripped the population growth over the past twenty years. For the next twenty years, we see this growth slowing down, mainly because this recreation activity is maturing.

Other new recreation activities such as geocaching and river surfing can increase much faster than the general population growth. The RMP needs to be adaptive enough to address new and emerging recreation activities over the next 20+ years.

The DEIS states "Alternative C would provide the greatest diversity of recreation opportunities." on Page 4-108. Alternative C does not provide the greatest diversity of recreation opportunities. Alternative D provides more diversity because it provides on and off route non-motorized (hiking and equine use) travel. Alternative C greatly restricts existing motorized access in the NCA. Alternative D provides a balance between motorized and non-motorized access.

The Future Anticipated Trends on Page 4-139 needs to be updated. The DEIS states " Population growth projections to 2025 in the Ada County area are from 13% in Kuna". Kuna's population has already grown 66% in the past four years according to Census Bureau statistics. This is an average growth of 16% per year. The Community Planning Association of Southwest Idaho



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completed a forecast of population, housing, and employment in 2005. This data should be used for the analysis. This data can be downloaded at <http://www.compassidaho.org/prodserv/demo-forecasts.htm>.

The DEIS also references semi-primitive non-motorized opportunities on Page 4-140. The NCA does not offer any semi-primitive non-motorized opportunities. The term should be changed to non-motorized opportunities.

In the Transportation Cumulative Impacts on Page 4-141, the DEIS states "Route designations in the Bruneau, Owyhee, and NCA could initiate or accelerate route designations on State and other land ownerships." This statement is inaccurate.

The United States Forest Service is further along in its route designation process than the BLM is. For instance, the Mountain Home Ranger District has designated routes 73% of its area and is currently designating the remaining 27%. Our department has already designated our routes within our State Parks System at Bruneau Dunes and Three Island State Park. The Idaho Department of Fish and Game also strongly regulates vehicle use within its Wildlife Management Areas. Only the Idaho Department of Lands has not designated routes on its lands.

Also on this page, the DEIS states "Overall the USFS and State Parks have begun to develop route designation processes, which could further limit opportunities in the region for cross country ORV use." The IDPR is not developing a route designation process, though we are working cooperatively with federal and state agencies in their travel planning processes.

#### **Chapter 5 Implementation and Monitoring**

Monitoring is a very important step in the implementation process. Monitoring tells decision makers whether progress is being made towards desired future conditions or not. It is absolutely critical that indicators be provided in the implementation plan, so monitoring can be adequately measured.

In Table 5-2 on Page 5-6, the recreation objective is covered. The plan will monitor use estimates from other state agencies (IDPR, IDF&G) and private entities (Idaho Power) on an annual basis. Use estimates are only one portion to an effective monitoring plan.

The RMP objective for Recreation is to provide a diversity of quality, resource based recreation opportunities. Use estimates do not measure quality. In order to measure quality, the BLM needs to set up visitor surveys like we do in our park units.

We are also concerned that the indicator/trigger for adaptive management is "Limits of Acceptable Change (LAC)". The Limits of Acceptable Change process was developed to determine recreation carrying capacity in Wilderness areas. The LAC process is very in-depth, requiring extensive consultation, which we highly doubt that the NCA will undertake to fulfill this monitoring requirement.

It also is very unlikely under the lifetime of the RMP that the NCA's recreation carrying capacity will ever be reached. A better indicator/trigger for adaptive management would be to ask, Are



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quality recreation opportunities on a downward trend? A visitor survey could help answer this question.

We are including a copy of our short survey and long survey that we do in our parks. Setting a visitor-monitoring program that includes human dimensions research would go a long way towards providing a quality recreation opportunity while protecting resources.

**Conclusion**

The Idaho Department of Parks and Recreation appreciates the opportunity to participate in the RMP planning process. The Snake River NCA and the Boise District Planning Staff have done a great job of both involving the public and other affected agencies.

The preferred alternative D gives the NCA the tools to effectively resource the lost vegetative resources that are hampering raptor populations. This alternative also tries to accommodate increasing and diversifying recreation uses. We encourage the BLM to tweak this RMP to better accommodate this use by using our comments and instituting visitor research in its monitoring efforts.

If you have any questions about our comments, please contact me at (208) 334-4180 ext. 230.

Sincerely,



Jeff Cook, Outdoor Recreation Analyst  
Comprehensive Planning, Research, and Review

Enclosures

