

John R Swanson
3400 Edmund Blvd
Minneapolis, MN 55404-2942

RECEIVED AT
BOISE DISTRICT

24 August 2006

2006 AUG 29 AM 11:21

Bureau of Land Management

2700 Development Ave.

Boise, Idaho 83725

Dear Sirs:

Please accept my following comments concerning the
Snake River Birds of Prey National Conservation Area;
Final Resource Management Plan and Draft Environmental Impact Statement.

I urge that this area be established as a wildlife fish and plant habitat on Trapp Ranch.
To designate each of the following discreet as a National Wild and Scenic River;

- And Creek
- Rabbit Creek
- Condon Creek
- Opauw Creek
- Carron Creek
- Flathemaker Creek
- Bennett Creek

and to Enlarge the Snake River Birds of Prey National Conservation Area to 746,812 acres
with a Wilderness of 618,192 acres.

To preserve this area's biological, scenic and wilderness resources.

Sincerely,
John R Swanson



Snake River Raptor Volunteers, Inc.
P.O. Box 7773
Boise, ID 83707
August 21, 2006

RECEIVED

AUG 31 2006

Mr. Mike O'Donnell
Boise District
Bureau of Land Management
3948 Development Ave.
Boise, ID 83705

LOWER SNAKE RIVER DISTRICT

2:45 PM
M. Jones

Dear Mr. O'Donnell:

We have reviewed the Draft RMP and EIS for the Snake River Birds of Prey National Conservation Area and find it to be a very comprehensive and high quality product. The description of the affected environment is very good and will serve as an excellent reference as the RMP is executed. As to the Alternatives, it is our conclusion that the Preferred Alternative for most resources will have the least adverse environmental impact while meeting the Desired Future Condition. The following comments point out some Rational, Objectives and Management Actions that on which we have suggestions and/or that we think need some clarification:

Cultural and Tribal Table 3.1 Last Management Action:

We think Alternative A is too passive and would select Alternative B to be the one that is preferred. We believe education of the public regarding cultural resources to be very important. We think interpretation can be done in a manner that will not jeopardize the integrity of sites while still relating the relevance of sites to today's world. This can be done regardless of whether the site/resource is pre-historic or historic.

Fish and Wildlife Table 3.1 Management Actions:

Since the work started on this RMP the Bureau has acquired the property near Grandview temporarily known as the Bull Pasture. The acres of woodland to be planted should be increased from 100 to include the acres envisioned for this site. Also there is an existing pond that will be renovated which should be reflected in this management action.

Special Status Plants Table 3.1 Management Actions:

In this table as well as several others that follow discuss fire protection for vegetation. In this case twelve miles of new fire breaks are proposed. There is however no mention of new Green Strips. Is green stripping not contemplated or will some of these new fire breaks actually be green strips? We believe that green stripping is an important for any fire protection plan where Cheat Grass is a major component of the landscape.



Another concern is that Winterfat doesn't show up as a particularly important shrub. It is our view that the blocked up patches of this plant in the NCA may be unique this far north in Idaho.

Upland Vegetation 3.1 Management Actions:

With the Management action regarding allocation of AUMs we are concerned that we find no explanation of the S&G guidelines and processes any where in the document.

We also wonder if the Management Action concerning camp fires may be too stringent considering the limited availability of developed camping facilities. We recommend you're considering seasonal restrictions that consider weather, ground moisture and location in regard to flammable vegetation.

Visual Resources 3.1 Objectives:

We believe that the Alternative D Objective should give the Snake River Canyon equal emphasis with historical areas. After all it is the Canyon itself that defines the NCA landscape and provides it's most scenic and awe inspiring vistas.

Idaho Army National Guard 3.1 Management Actions:

We are concerned that the IANG could attempt an end run to withdraw not only their live fire impact area but the whole OTA. The whole OTA is important hunting area for all the raptors and could be nesting habitat for some as well. All of the OTA excepting the impact area should remain an integral part of the NCA. We urge the BLM to take steps to make sure this happens.

We could not find any reference to the IANG taking responsibility for restoration of depleted vegetation sites within the OTA. . We believe they should finance any work inside the OTA. It is also not be unreasonable to expect the Guard to help fund projects outside the Area. This is in consideration of the fact that prior a change in policy and their assuming initial attack capability, their exercises started many fires that escaped and burned large areas beyond the OTA perimeter creating annual grass monocultures.

We support the enlarged no-shooting Management Action. We see this as desirable as a safety measure for Guard personnel as well as for the reduction in prey mortality.

Lands and Realty 3.1 Management Actions:

In the third Management Action we suggest that the phrase *—or at least not adversely affect—*be stricken. We are concerned that there will not be a net loss of acreage from the NCA after the proposed boundary adjustments are made by the Congress. Of major concern is the need to trade out the state lands for BLM lands outside of the NCA.

We are also aware that an existing major exchange proposal for the Boise Front includes the conveyance to private ownership, State Section 16 T. 3 South, Range



1 East. This is a key state section that straddles the Snake River and should be in Federal ownership. We urge BLM to take steps to make certain this section is removed from the Boise Front proposal so it can be acquired when the Lands and Realty portion of the plan is implemented. We also urge the NCA staff to give high priority to implementing the state land exchange portion of the plan.

Livestock Grazing 3.1 Standard Operating Procedures/Management Actions:
We suggest that there be a statement in the SOP section Page 3-48 that addresses the need livestock graziers and the Bureau to work closely to attain the DFC stated for Vegetation and Livestock Grazing in Chapter 1. It will be imperative that NCA personnel educate the graziers as to the need, process and benefits of meeting these DFCs. It is in the long term interest of the graziers to actively participate in the implementation of the Plan.

Recreation Management Actions 3.1:
As stated in our comments on the IANG Management Actions we fully support the proposed no-shooting area. First it will be a safety factor for recreationists as well for reducing prey mortality for a large raptor hunting area. It also reduces the shooting risk for raptors.

We are pleased to see a listing of potential new recreation sites for development. We do suggest that you have an option for finding and developing other sites as the demand grows with our ballooning population growth on or near the NCA.

Utilities and Communications 3.1 Rational/Movement Actions
There are some anecdotal reports of emissions from cell towers disrupting the navigational capabilities of birds. We urge a prohibition of cell towers be included in the Rational section until there is data on impacts on raptors that shows no effect.

Wildland Fire Ecology and Management 3.1 Management Action:
We recognize the hazard of escaped campfires but suggest that there be some slack cut for campers in the late fall through early spring seasons when the fire hazard is low. There could be a permit system during that seasonal period for groups who wish to camp in non-formal campground settings.

As we noted in the SSP section above there is a need to clarify the intent for the use of Green Strips. We think this is too important a tool not to have some prominence in the plan.

We mentioned in the Upland Vegetation Alternatives section the lack of descriptive detail for Standards and Guides. Some processes such as to how SSP is to be protected and managed is articulated almost to an excess. We are concerned that there is no similar explanation of what Standards and Guides involve. Since the Standards and Guides are



the key tools for allocating forage for livestock and managing vegetation, we urge you to give them prominent attention somewhere in the document.

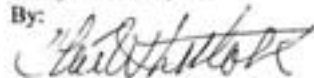
In the SSP section we mentioned our concern for Winterfat. We suggest that this plant should be given higher status than just another shrub. We believe that the NCA may host the northernmost Winterfat monoculture patches in Idaho and that it should receive extra attention as to how it is grazed and how it is protected from fire. It is a highly nutritious plant valuable for sustaining ground squirrels as well as providing winter forage for sheep. Some patches have been invaded by Cheat Grass making them very vulnerable to destruction by wildfire. Once burned these patches will not regenerate. The practice of reestablishing these stands through reseeding has thus far not proven to be a viable option. We believe Winterfat should qualify as a SSP, or at least as a plant of significant concern. It is truly unique and should be given protection commensurate with its uniqueness.

Again we extend our congratulations on an excellent document. We appreciate the opportunity to comment on it and to make suggestions.

Sincerely yours,

Mike Ihli
President SRRV, Inc.

By:



Clair Whitlock
Treasurer SRRV, Inc



Snake River Birds Of Prey NCA
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Bureau of Land Management
Boise District Office
John Sullivan, Mike O'Donnell
3948 Development Ave
Boise ID 83705

RECEIVED

AUG 31 2006

LOWER SNAKE RIVER DISTRICT



*1:06 P
Smog*

To Whom It May Concern:

The Idaho State 4x4 Association, along with support including but not limited to Representative Pete Nielsen and the Elmore County Commissioners office would like to formally request management duties of the Canyon Creek Sand Wash area. This area is located on the north side of Grandview Highway near the Simco road intersection. Please see attached map and description of this land for complete details of location and size. We understand and intend to uphold the legislation in place for the National Conservation Area by maintaining a designated location for motorized recreation with a main purpose of education and safety. This land will continue to be located in the Snake River Birds of Prey National Conservation Area indefinitely with the possibility of a land swap in the future. Current support of this management request by Elmore County and officials in nearby cities, gives the opportunity and possibility for a land swap that would exchange this land, value for value, with land that is a better candidate for conservation designation. We hope to secure the designation of this area as an open motorized recreation area and implement management ideals that would satisfy most members of the public with an interest in this land. The Idaho State 4x4 Association makes this request as a non-profit organization with the complete disclosure that we intend to improve the quality and condition of this land as well as improve the general appearance and opinion of this area. It should be perfectly clear, however, that the current state and use of this land is acceptable and no improvements are needed to satisfy our desire to request and manage this area. We want this land as is.... and only intend to improve this land. We fear that closure of this area would be less responsible than proper management and closure would only encourage cross-country travel on land that is better suited for conservation.

Proper management of this area would be an evolving practice. We recognize the need for multiple recreation use for all public lands and will include input and feedback from organized user groups including but not limited to the Idaho ATV Association, South West Idaho Mountain Bike Association, Southern Idaho Dirt Racing Association, Treasure Valley Trail Machines, Idaho Recreation Council and any other recognized or organized user groups that would have an interest in using this area for motorized recreation. We will also require input and feedback from other recreation groups, and would make the contact information available on site in a reader board as well as other methods of publication. Management duties would continue to improve as user input and direction are infused into the management plan.

Current details of the management plan for this land include the explicit request from the BLM that for now, shooting be prohibited on this specific land for the matter of safety and pollution. As a quick note to curb any concern about this being anything more than a safety issue, shooting would absolutely be allowed on this land, if proper steps are taken to improve safety. Additionally, shooting is allowed almost everywhere adjacent to this land and most anywhere on State and Federal Land. The biggest concern of safety is the threat that dense shooting in the same locations as motorized recreation will cause a noticeable conflict. This conflict is the biggest concern for the BLM as well as the Idaho State 4x4 Association. Our 4x4 vehicles are generally muffled street driven vehicles that cannot be heard for great distances. Once again the close proximity of the trails to familiar shooting locations on this land poses the single largest threat to safety. Currently, there are no remote areas that protect shooters from the trails and the general direction of target shooting is not managed. The other matter of concern voiced by the BLM was the pollution of the land by heavy metals. There are currently no managed shooting ranges in this area, however, the dense use of this land for target practice is creating a noticeable accumulation of heavy metals that can make cleanup very difficult. The Idaho State 4x4 Association has no intention of specifically excluding shooting in this area, but would abide by the BLM request that no shooting be permitted in this area until a formal proposal is made by a recognized association of shooters. Further, in compliance with the request from the BLM, shooting will only be allowed in this area if a facility is constructed for the purpose of range shooting. This facility would have to comply with NRA guidelines and all plans will have to get approval from the Idaho State 4x4 Association



as well as be open for public input and approval. Any costs, plans or implementation of this facility would be at no expense to the Idaho State 4x4 Association, however we openly offer our support and volunteer our time towards fundraising for this cause.

Management of this land will involve the Idaho State 4x4 Association along with other interested parties including local 4x4 and ATV clubs. Education will be the absolute common theme in the management of this land. Education topics will include conservation, protection, habitat recognition and multiple use designation information for all users. Education will be administered in various ways, but the single strongest method of education will be the continued Clean Up event that the Wild West Off-Road club out of Mountain Home has conducted in the past and has vowed to continue for the future. The Mountain Home chapter of the Idaho ATV Association has also pledged their cooperation to continuing that event. Tens of thousands of pounds of garbage were extracted from that site by this clean up effort last year at no expense to the BLM or any local businesses. Volunteers from the local clubs as well as members from the Boise area understand that taking care of this land is very important. We want to help the BLM and expand our efforts to vastly improve the character of that land.

Another detail of the management plan for this land includes the follow through and implementation of the fencing that BLM has already set in motion. BLM allotted fencing money to adjacent landowners for the purpose of enclosing this land and eliminating traffic from the Sand Wash area into the adjacent land. Fencing plans that are in place will continue and fencing will have the purpose of limiting the expansion of motorized trails so that they do not expand beyond the perimeters of the area set forth. Fencing that follows the perimeter will continue to be maintained by the adjacent landowners as well as volunteer efforts from members of the Idaho State 4x4 Association and other local groups.

Any recreation done on this land will encourage commerce in Elmore County. Most recreational users spend money at establishments near recreation spots. This pours money into the economy locally as well as gives businesses locally the opportunity to directly benefit from commerce from locals as well as those that travel to Elmore County from farther away. There are many companies that will benefit from the purchase of fuel, food and supplies. Business owners in Elmore County have shown support for this management plan and they include vehicle repair shops, parts suppliers and towing companies. These are local business owners that are vital to the economy of the county.

We realize that the scope of this current plan is very narrow and the management plan is fairly vague. We need to summarize our purpose to address this. This management request is based upon fairly forward requests from discussions with BLM land managers and our dedicated effort to keep public land accessible to the public. We are requesting this land for our motorized recreation, but for the ultimate purpose of keeping the land open to all members of the public. We do not accept the alternative that has been communicated – "Closed" with permanent fencing. We hope that all members of the public and all interested parties can embrace and support the Associations desire to keep this land open and realize that we are humble and receptive to all requests for improvements and sport specific designations within this area. We once again have no intention or desire to exclude any users from this area and want to be a strong leadership towards improving the use of this land. This goal is going to serve the purpose of the current Resource Management Plan, uphold the principles of the National Conservation Area, and provide the BLM with a managed support system for this area. This will enable them to better manage other areas that are better candidates for conservation. We are also improving the character of land that is close to private property and ultimately increasing awareness about land use.

We, 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,



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President
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825 NE Multnomah
Portland, Oregon 97232

August 23, 2006

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

Re: Comments on the Draft Resource Management Plan and
Environmental Impact Statement for the Snake River Birds of Prey National
Conservation Area

Dear Mr. O'Donnell:

PacifiCorp appreciates the opportunity to provide comments on the draft Resource Management Plan (RMP) and Environmental Impact Statement (EIS) for the Snake River Birds of Prey National Conservation Area. We want to ensure that the Bureau of Land Management (BLM) understands the issues and recommended actions that could potentially impact PacifiCorp's existing facilities. We also request that BLM consider not only our existing rights and uses but the potential for future energy development, which would require rights-of-way on federal land identified in the EIS and RMP for Snake River Birds of Prey National Conservation Area.

We are interested in making sure that the final decision document provides PacifiCorp with the ability to maintain existing facilities, upgrade and/or expand existing facilities; and locate new facilities as needed. The BLM has indicated that alternative D is preferred which includes a 43,000 acre avoidance area and no new utility corridor. PacifiCorp generally supports most components of alternative D but has concerns with the no new energy corridor and that all transportation systems "would be located within the existing utility corridor" (pg 3-68 table 3.1). PacifiCorp would prefer to see alternative D include the new energy corridor as proposed in alternative C and continued use of existing road network transportation language as described in alternative B (pg 3-65). Please refer to the enclosed table for our extended comments on the draft RMP.

We have also compiled a map of PacifiCorp's facilities within the RMP Planning Area for the Snake River Birds of Prey National Conservation Area and are transmitting the following information to you on the enclosed CD for your review and consideration:

- A map of PacifiCorp's facilities within or near the BLM Planning Area as well as geographic information system (GIS) data shapefile.



- A document titled "Electric Transmission and Distribution Line (Power Line) Maintenance Activities." We have prepared this document so that federal and state land managers will have a better understanding of PacifiCorp's operational and maintenance needs for access its facilities on public lands.

PacifiCorp has long recognized the need to develop business practices, both on public and private lands, which are in harmony with valid and appropriate land use requirements. We are committed to maintaining our cooperative relationship and record of stewardship on BLM lands. We hope the enclosed comments will allow the BLM to produce a final RMP that offers suitable protections to the unique resources within the planning area while accommodating both existing and future uses including PacifiCorp facilities required to provide critical electric services to the people of Idaho and western United States.

If you have any questions on the enclosed information, please feel free to contact Maggie Hodny in PacifiCorp's Portland office. Maggie can be reached at 503-813-5889.

Sincerely,



Jeff Richards - Attorney
PacifiCorp
Office of General Counsel

Enclosures

