

IDAHO CHAPTER
THE WILDLIFE SOCIETY

August 12, 1985

NATIONAL HEADQUARTERS
SUITE 611
7101 WISCONSIN AVE. N.W.
WASHINGTON, D.C. 20014

Mr. Martin Zimmer
Bureau of Land Management
3380 Americana Terrace
Boise, Idaho 83702

Dear Mr. Zimmer:

The Wildlife Society is a professional society for wildlife biologists. The Idaho Chapter currently has over 150 members located throughout the state. We have reviewed the Draft Management Plan for the Snake River Birds of Prey Area and have the following general and specific comments we would like entered into the public record.

General Comments

In general, the draft management plan lacks the necessary detail and organization essential in a management plan for such an important area. In the first paragraph of the text we were confused as to whether this document is a summary of the plan or the actual plan. The document alludes to several other management plans (MFPs, RMPs, RAMP) where the reader can obtain more detailed information. It is difficult for reviewers to go to these other documents for more information in the review time provided. The management plan for the Birds of Prey Area should be a comprehensive document that outlines goals objectives and tasks. Usually plans are written for short and long-term periods with specific goals and tasks identified. We could not determine what period of time this management plan was intended to address. We recommend that the management period, specific goals and tasks be stated in this document.

Public Land Order 5777 clearly states that the purpose of the Birds of Prey Area is to "...protect and maintain the ecosystem necessary to support and perpetuate the densest and most diverse populations of eagles, hawks, falcons, owls, and other birds of prey ever recorded." This specific direction seems to have been lost in the writing of this document. The Birds of Prey Area was not intended to be a recreational area for the Bureau to display its wildlife resources. In our opinion the strong emphasis on recreation and very weak emphasis on ecological monitoring and research in this plan is inconsistent with the intent of P.L.O. 5777.

Specific Comments

Recreation - This is the most comprehensive part of the plan with specific actions and recommendations identified. We did not have the opportunity to review the Recreation Area Management Plan (RAMP) and would be interested to know the extent of public review this document received. We have several concerns about this section of the plan and the overall direction the Bureau is taking in the management of the area.

We are not convinced that the cumulative effects of this recreation plan will not adversely affect the raptor population over time. Has the Bureau investigated what increased human use of the area may do to nesting and foraging raptors in the future? Who within the Bureau has the responsibility to make the determination that an action or group of actions would not adversely affect the raptor population or its prey?

Again, the intent of P.L.O. 5777 was not to develop a recreation/education area for the public to learn more about raptors. Is attracting people from Interstate Highway 84 to the Birds of Prey Area consistent with the mission and goals for which the area was established? None of the management goals as stated in the introduction suggest that attracting and then catering to tourists is a major management objective for the area. This is not to say that all of the proposed actions in the recreation plan are inappropriate. However, we suggest that the Bureau has gone to extremes and has not considered long term impacts to the raptors and their prey as a result of encouraging more public use of the area.

Fire Management

After the level of detail provided in the recreation section, this section (as well as all the remaining ones) seems almost an after-thought with little management direction. Where are the specific actions as were described in the recreation section? Over 150,000 acres of the Birds of Prey Area has burned over the last 5 years. It is well known that Townsend ground squirrels are associated with healthy shrub/grass/forb vegetation communities. What has the Bureau done in the past and what does it plan to do in the future to reestablish sagebrush-winterfat plant communities? It is also imperative that no conversion of burned areas to a monoculture of perennial grasses, i.e. crested wheatgrass, be included in any fire management plan for the area. This plan should identify specific actions and programs designed to restore areas that have burned such as restoring vegetation communities that prey species are dependent upon. We recommend that at least one of the full time permanent staff positions that were identified in the recreation plan be shifted to manage fire rehabilitation efforts. At least two seasonal aides should also be assigned to this effort. This section of the plan is much more important to the well being of the raptor population than the recreation section and should receive considerably more management emphasis.

Military Training

The Bureau indicates that the number of personnel being trained within the Birds of Prey Area has "...steadily increased over the years." What is the increase and is this trend expected to continue? What are the actual numbers of personnel and amount of area involved? Has there been any kind of environmental assessment done to evaluate impacts on raptors and other wildlife? The Bureau indicates on page 42 that it will monitor effects of military training on the birds of prey. What has the Bureau done in the past and what kind of monitoring program is planned. Monitoring implies that some threshold level of impact has been set and that actions will be monitored so that this level is not exceeded. Where is this information described in the plan?

Ecosystem Monitoring, Research and Studies

It is inconceivable that this section, which should be the heart of the management plan, receives only one page of discussion. This part should specifically detail what research and monitoring programs are planned for the future. The Bureau has the rare opportunity to study wildlife and plant communities on a long-term basis but there appears to be no direction towards that goal. The Chapter would like to see specific programs and actions identified in this plan.

The recreation plan proposes to increase visitor use of the area and yet this particular section does not even identify that this will be monitored. Similarly, military training has been increasing on the area and as identified, it is the responsibility of the Bureau to monitor the effects of these activities to wildlife. A program to monitor military actions is absent in this section.

It appears to the Idaho Chapter that demands which are inconsistent with the intent of P.L. 5777, are being placed on the Birds of Prey Area while research and monitoring programs are only being superficially addressed. Long-term impacts of management actions on plant and animal communities must be intensively and consistently monitored if the mission and goals of the area are to be achieved.

Conclusions and Recommendations

This plan should be rewritten to provide the essential level of detail necessary for each section. The Bureau should also reevaluate the management direction implied in this document as it appears to be inconsistent with the mission and goals statement in the introduction.

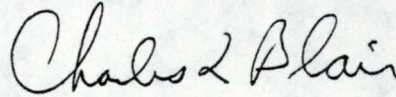
We do not agree with the Bureau that it is appropriate to do Environmental Assessments on a case-specific basis. The Bureau is obligated to investigate cumulative actions as mandated by the National Environmental Policy Act. Based on the contents of this draft plan we recommend that the Bureau write an Environmental

Impact Statement for the management plan. The Chapter believes that this proposed plan may cause long-term adverse impacts to wildlife populations, especially raptors, in the Birds of Prey Area.

Because of the essential ecological significance of the Birds of Prey Area, the Chapter recommends that an advisory committee be formed to review and make recommendations to the Bureau concerning proposed actions within the area. This committee should be made up of scientists specializing in the fields of ornithology, mammalogy, botany, and/or plant and animal ecology. There are many qualified candidates in the Boise area. This committee would help to insure that management actions in the Birds of Prey Area are consistent with the intent of P.L.O. 5777.

We appreciate the opportunity to review the draft plan.

Sincerely,



for Lewis Nelson
President, Idaho Chapter
Wildlife Society

cc: TWS-National Headqtrs.
IDFG, Headqtrs., Boise
BLM, State Director, Boise
USFWS, Boise
TNC, Portland
Nat. Wildlife Fed., Boise